

PHILADELPHIA CITY PLANNING COMMISSION  
April 19, 2011

PRESENT:

Alan Greenberger, Chairman  
Joseph Syrnick, Vice Chairman  
Patrick J. Eiding  
Bernard Lee, Esq.  
Elizabeth K. Miller  
Nancy Rogo Trainer  
Anna Wallace Adams, representing Rob Dubow

ABSENT:

Richard Negrin  
Nilda Ruiz

Executive Director:

Gary J. Jastrzab

Chairman Alan Greenberger convened the City Planning Commission Meeting of April 19, 2011 at 1:10pm.

- 1) Approval of the Minutes for the March 15, 2011 meeting.

Upon motion by Mr. Eiding, the City Planning Commission approved the minutes for the March 15, 2011 meeting.

- 2) Executive Director's Update

Mr. Jastrzab stated we are about to begin CPI courses on April 25, May 5, and May 9, and a special workshop on Saturday, May 14 at the Philadelphia City Planning Commission from 9am to 12pm. And we are offering three add-on courses: May 16 will be commercial corridor development; May 23 will be TOD and public transit; and June 2 will be environmental justice and healthy communities. All of the courses will be held at the Community College of Philadelphia. We received over 100 applications; and selected 30 students.

#### Items in Accord with Previous Policy:

- **American Commerce Center** – The original Bill No. 080588 was introduced on June 19, 2008 by Councilmember Clarke. The Philadelphia City Planning Commission recommended approval in November 2008 with an amendment to strike certain provision regarding incentive floor area. It was passed by Council on December 11, 2008, and signed into law on December 22, 2008. The Sunset provision would expire in January 2011 unless extended by the Philadelphia City Planning Commission. Bill No. 090472 was introduced on June 4, 2009 by Councilmember Clarke to amend Bill No. 080588 to require Council approval of the plan of development. The City Planning Commission considered this on July 21, 2009, and recommended approval. It was passed by Council on December 3, 2009, and signed into law on December 16, 2009. In July 2010, the Pennsylvania General Assembly approved Senate Bill 1042, extending all permits, as well as any approvals by Boards and Commissions to July 2, 2013. Expiration date of an approval that is in effect during extension period shall be automatically suspended during extension period. After consulting with the Law Department, it is agreed that we extend the Sunset Provision for another year.
- **1601 Vine Street in Franklin Town Urban Renewal Area** – Recommended staff approval of Redevelopment Agreement with the Church of Jesus Christ of Latter-Day Saints. Proposal is for parking as an interim use, and eventual mixed-use development of the site located to the east of the proposed Mormon Temple at 17<sup>th</sup> and Vine Streets. This is in accord with the Center City Redevelopment Area Plan.
- **Bill No. 110186** – This Bill conveys 1900-70 N. 9<sup>th</sup> Street to Asociacion Puertorriquenos en Marcha for a nominal fee. The City Planning Commission staff reviewed the development proposal and voted to approve the zoning remapping Bill #100377 for the site on June 8, 2010 to allow for a mixed use development. The plans for the site remain unchanged. This Bill was introduced by Councilmember Clarke on March 10, 2011.

- **Bill No. 110182** – Places two right-of-ways on the City Plan for sewer and drainage purposes within the property known as the Frankford Arsenal. The city Planning Commission recommended approval for Bill No. 110051 on February 15, 2011 for the zoning change to permit the construction of the Frankford Arsenal Shopping Center. Therefore, the staff recommends approval for Bill No. 110182 as an item in accord with previous policy.
- **Amendment to the Haddington Urban Renewal Plan (Units #2 and 3)** – The purpose is the acquisition of 8 vacant lots on 59<sup>th</sup>, Market, and Filbert Streets for eventual TOD development near 60<sup>th</sup> and Market. This is consistent with the Haddington Redevelopment Area Plan.
- **Redevelopment Agreement with Project H.O.M.E. for 1941-45 and 1937 Judson Street in North Philadelphia** – The purpose is for development of a parking lot for use by neighborhood residents and Project H.O.M.E. staff. This is consistent with the North Philadelphia Redevelopment Area Plan.
- **Redevelopment Agreement with Aiding Communities through Service for 1326-36 N. 52<sup>nd</sup> Street** – The purpose is for development of community playground with funding from Mercy Health System. This is consistent with recommendations in the Plan for West Philadelphia.

Mr. Eiding asked if there are any developments on the American Commerce Center.

Mr. Jastrzab replied nothing at this time.

### 3) Briefing on 2010 Census Population Data

Jametta Johnson, Planner with the Strategic Planning and Policy Division, stated that over the past two months the Census Bureau has been releasing first round of population, housing and race data from the 2010 Census, on a state by state basis. The U. S. Census Bureau is required by Public Law (94-171) to release this redistricting data to each state by April 1, of the year following the Census. Public officials use this data to realign congressional and legislative districts based on population changes since 2000. The more detailed Summary File 1 Data Tables (with 63 race categories, group quarter, tenure and age data) will be released in June-August of this year. On March 9, 2010, the Census Bureau released 2010 Redistricting data for the state of Pennsylvania. Based on these numbers Philadelphia's population increased from 1,517,550 in 2000, to 1,526,006 in 2010. This 0.56% population increase (0.557%), translates into an additional of 8,456 people. This marks Philadelphia first decennial population increase since 1950. Today presentation will briefly examine the 2010 Census population and race numbers for Philadelphia from a local regional and national perspective. It should be noted that there were extensive census tract changes made between 2000 and 2010 that make it difficult to compare data between the two decades. However, we are in the process are aligning the geographic changes to facilitate the comparative analysis of this data. Later this year, after the complete Summary File 1 data is released, we will present a more detailed analysis of this data, along with the map changes. This growth is transforming the entire country. As we plan for the future, we need to be mindful of these changes. The U.S. Census distinguishes between race and ethnicity; and they consider Latino/Hispanic people and ethnic group, not a race. The major race categories are white, black or African American,

Asian, American Indian, and Alaska Native and Native Hawaiian, and other Island Pacific Islander, and some other race category. In 2000, for the first time, the Census Bureau allowed people who are bi-racial. That's the data that will be released in June. Philadelphia's population by race: white is down; black remains the same; and Latino and Asian are growing. The Latino and Asian are the growing population. We continue to lose 8.35% of white population. This growth of Latino and Asian population in Philadelphia is consistent with regional and national trends. Latino population continues to be the main driver of national population growth, along with the more recent growth of Asian population. This is what we will be seeing across the country. San Antonio increased in population across the board, as in Boston and Washington, D.C. Baltimore and Chicago lost population. Philadelphia has an 80,000 person lead over Phoenix. The U.S. population grew over 308,000,000. This was an increase of 27 million, and of that 15 million were Latinos. Michigan is the only state that has lost population. Regionally the south has continued to grow. The state of Pennsylvania has grown 3.4%. The fastest growing are Forest, Monroe, and Pike counties. Latino population has grown 82.16% in the state. The entire state has seen an increase in growth of minority population. The Asian population is also growing quickly. She thanked Octavia Hall for the graphics and Darshna Patel for the maps.

4) Acceptance of the Yorktown Master Plan 2015.

David Fecteau, Planner with the Community Planning Division, stated Yorktown was one of the city's first successful redevelopments in Philadelphia. In the late 1950s, city government cleared over 150 acres of blight and invited a private developer, the Denny Corporation, to build a new neighborhood. This neighborhood began as, and has continued to be, primarily African American, single family, and owner occupied. There is not a lot of open land. It is located north of Girard Avenue, east of Broad Street, south of Cecil B' Moore, and west of 10<sup>th</sup> Street. Temple University is located just north of the neighborhood. In the summer of 2010, the Yorktown CDC hired Wilson Associates and Interface Studio to create *Yorktown Master Plan 2015*. Funding was paid by the Yorktown CDC, LISC, the Opportunities Industrialization Center, and a neighborhood resident. The plan focuses on maintaining and improving what currently exists. Project team was lead by V. Lamar Wilson associates. Single-family residential is the heart of Yorktown. The 6 spaces are community rights-of-way. It is similar to what Ed Bacon did with Society Hill. Major recommendations that City government may have a role in is the Preservation District for the overlay. They lean more to conservation overlay, which our staff would help them with. Financial incentives would come from OHCD. They consider forming a local zoning committee, which our staff would help them with. The infrastructure has aged well here. Neighborhood would like to see upgrade in lights, refurbished spaces that are rights-of-way, vitalized courtyards by working with the Design Collaborative. They are in talks with the Water Department regarding stormwater management. They want solar trash cans, which the Streets Department can help them with. Tree coverage is 9%, which is not a lot. Existing rec centers are on the perimeters. As people age, they would not want to use basketball courts. Replace the courtyards with soft courtyards. The Planning Commission staff recommendation is acceptance. Between 6 of those blocks we are looking at 300,000 and 500,000 for improvements. The CDC has already started by reaching out to the Philadelphia City Planning Commission and others. (See supporting letters – "Exhibits 4A and 4B").

Mr. Greenberger stated he is very pleased with this.

Priscilla Woods thanked the Commission for the presentation of this plan, and she thanked the consultants. She thanked David for the excellent presentation of this plan. She thanked their neighbor/partner, who walked in with a check in his hand.

Upon motion by Mr. Lee, seconded by Mr. Synchronick, the City Planning Commission accepted the Yorktown Master Plan 2015.

5) Update on the Draft Citywide *Philadelphia2035: Comprehensive Plan*

Alan Urek, Division Director of the Strategic Planning and Policy Division, stated in May we will ask you to comment on the first chapter of a 19 chapter process. Release the plan in February. We had a very successful open house at the Center for Architecture in March. We will have another one this Thursday, and next Tuesday. We have extended the deadline for public comments. We are going to rename it. We are going to call it a "vision". There are case study definitions in 4 sections: defining content section – Census adjusting population (slightly larger population); building strength – implementation of the plan and 18 district plans; Amtrak corridor; be more clear what these industrial legacies are. Our themes are thrive, connect and renew. In the thrive section – we need to be more robust and reinforce partnerships; more substantive about arts and cultural; stronger discussion with TOD; we were light on waste management. Making it happen – we have had a lot of feedback on it. We need to establish a mechanism for implementation. What happens next? Public comment extended until next week. We will have a kick-off on May 7 at Moore's College of Art.

Sam Little, member of the Crosstown Coalition, and Joe Shiavo. He is also a member of the Logan Square Neighborhood Association. Mr. Little remarked Gilda Radner said "Never mind". We had a lot of discussions and 99% have been addressed. Boosterism versus realism. Poverty has not been addressed. Part of what the plan has done is to get everybody together for a partnership. You are working on rezoning, Comprehensive Plan, and remapping. We are a bit nervous that there are not resources to get the Comprehensive Plan done. We are here to help you.

John Gallery, Executive Director of the Preservation Alliance for Greater Philadelphia submitted his testimony with attachments (see "Exhibit 5A"). He said you are going to be getting comments on April 30 for the May release.

Mr. Greenberger thanked them for their very good comments.

Ms. Wallace Adams left at 2:10pm.

6) Model Cities Urban Renewal Plan Amendment: Authorizing the acquisition of 54 properties in North Philadelphia on the block bounded by 21<sup>st</sup> Street, 22<sup>nd</sup> Street, Cecil B. Moore Avenue, and Nicholas Street, for redevelopment as a health and wellness center. Also proposed for acquisition is 2804 West Oakdale Street, to be included in a PHA residential development project.

Mr. Fecteau stated Model Cities was established in 1960's and 1970's. The Redevelopment Authority is asking for the authority to turn 2804 W. Oakdale Street over to PHA. The 54 properties are in north central Philadelphia. The Redevelopment Authority is

asking for the acquisition of the 54 properties, with only 3 to 9 properties needing relocations. The proposal is for Project H.O.M.E. for a health and wellness center. It may be built in phases. The parking lot may contain a senior center. The Planning Commission staff recommendation is approval.

A brief question and answer session ensued between Mr. Greenberger, Mr. Fecteau, Mr. Eiding, Tyron Reed for Better North Philadelphia, Ms. Warnock from Project H.O.M.E., and Mr. Lee.

Upon motion by Mr. Eiding, seconded by Mr. Lee, the City Planning Commission approves the Model Cities Urban Renewal Plan Amendment: Authorizing the acquisition of 54 properties in North Philadelphia on the block bounded by 21<sup>st</sup> Street, 22<sup>nd</sup> Street, Cecil B. Moore Avenue, and Nicholas Street, for redevelopment as a health and wellness center. Also proposed for acquisition is 2804 West Oakdale Street, to be included in a PHA residential development project.

- 7) Parkside-Lancaster Urban Renewal Plan Amendment: Authorizing the acquisition of 54 properties in West Philadelphia in the vicinity of 53rd Street and Parkside Avenue, for redevelopment as affordable multi-family rental and homeownership units and a community garden.

Andrew Meloney, West Philadelphia Planner, stated this item is for the acquisition of 54 properties, most of them are residential and some commercial. We have been working with the Parkside neighborhood. We are looking at the mixed-use development that was put into the Centennial Plan and the Strategic Plan. The Planning Commission staff recommendation is approval.

Lucinda Hudson, Parkside Association, stated we decided that after we completed the mall, that we wanted to continue with the surrounding area. We are thankful for the work of the Deputy Mayor and Andy Meloney our planner.

Upon motion by Mr. Eiding, seconded by Mr. Syrnick, the City Planning Commission approved the Parkside-Lancaster Urban Renewal Plan Amendment: Authorizing the acquisition of 54 properties in West Philadelphia in the vicinity of 53rd Street and Parkside Avenue, for redevelopment as affordable multi-family rental and homeownership units and a community garden.

- 8) Development Proposal for 8<sup>th</sup> and Walnut Streets:
  - a) Zoning Bill No. 110184: Amending the Zoning Code and remapping the area bounded by Walnut, 8<sup>th</sup>, Locust, and 9<sup>th</sup> Streets from "C4" to "C5" Commercial (Introduced by Councilmember DiCicco on March 10, 2011).
  - b) Streets Bill No. 110231: Proposes two encroachments onto 8<sup>th</sup> and Walnut Streets (Introduced by Councilmember DiCicco on March 24, 2011).

Mr. Lee recused himself.

Larissa Klevan, Development Planning Division, stated we saw this item as an information only back in February. The purpose of this bill is to rezone certain parcels of land within the designated boundaries from "C4" Commercial to "C5" Commercial. The purpose of this bill is to rezone certain parcels of land within the designated boundaries from "C4" Commercial to "C5" Commercial. The bill also proposes an adjustment to Section 14-305(7)(e)(2)(b), the maximum height restrictions for "C4" Commercial and "C5" Commercial for the South Side of Walnut Street, allowing structures in an area bounded by Walnut Street, 8<sup>th</sup> Street, Locust Street, and 9<sup>th</sup> Street to have a maximum height of two hundred and sixty feet, for each foot you increase in height, you would need a setback. In addition to the rezoning, it includes: 1) encroachment for a marquee; and 2) façade improvement. The Planning Commission staff recommendation is approval.

A extensive question and answer session ensued between Ms. Rogo Trainer, Ms. Klevan, John Gattuso, Bill Fisher, Carl Primavera, Esq., Michael Allan, Esq. of Wills Eye Hospital, John Sloskey of Stonehenge, Ron Bolland of Thomas Jefferson Hospital, Lorna Katz Lawson of the Society Hill Civic Association, Mr. Eiding, and Mr. Greenberger.

Upon motion by Mr. Eiding, seconded by Mr. Syrnick, the City Planning Commission approved Zoning Bill No. 110184 and Streets Bill No. 110231.

9) Chestnut Hill College IDD Master Plan approval.

Ms. Rogo Trainer recused herself.

Mr. Greenberger stated you saw this project over a year ago for the Master Plan.

Martin Gregorski, Development Planning Division and IDD supervisor for the Philadelphia City Planning Commission, stated this action would permit the rezoning of the Chestnut Hill College Main Campus, as well as the adjacent Sugarloaf Campus to Institutional Development District. Additionally, it would approve the Master Plan for the existing facilities as well as the new residential and parking facilities which would be located on the Sugarloaf Campus, as well as the new Campus Center on the main campus. The new Campus Center will house academic and recreation facilities as well as house a parking garage for 550 spaces. The new Sugarloaf campus will house residence halls, some academic facilities, and a parking garage for 450 cars. A Bill of Council will need to be introduced and approved in order to rezoning this property, and approve the new Master Plan, which is a condition of the zoning change. We don't see this very often. It is located in the vicinity of the intersection of Germantown and Northwestern Avenues. There are two pieces of process: 1) rezoning "R2" and "R1" to IDD (Bill has not been introduced); and 2) to adopt the Master Plan for IDD. For the IDD Master Plan, only plans that have been approved by the Philadelphia City Planning Commission and City Council can be built. The uses that are permitted in IDD are not permitted in other locations. It allows them to move the uses around the campus. They are Allowed 40% of lot for Sugarloaf; they are proposing 39.1%. The occupied area is 70%; they are proposing 13.5%. The required parking spaces are 423; they are proposing 1,336 spaces. We are recommending approval for the Master Plan itself. The changes to the IDD are not on the table today. The Planning Commission staff recommendation for both items is approval.

Peter Kelsen, Esq. representing Chestnut Hill College, Peter Saylor, Mr. Syrnick, Mr. Greenberger, Robert Vance, President of the Board of Directors of the Friends of the Wissahickon (see "Exhibit 9A"), George Thomas, Vice President of the Northwest-Wissahickon

Conservancy (see "Exhibit 9B"), Robert J. Shusterman, President of the North Chestnut Hill Neighbors (see "Exhibit 9C"), Larry McEwen, Chair of the Chestnut Hill Community Association's Coalition Negotiating Group (see "Exhibit 9D"), Mr. Eiding, Mr. Lee, and Ms. Miller.

Upon motion by Mr. Syrnick, seconded by Mr. Eiding, the City Planning Commission approves the Chestnut Hill College IDD Master Plan.

Mr. Lee abstained.

- 10) Zoning Bill No. 110185: amending the Zoning Code and remapping the area bounded by Richmond Street, Cumberland Street, Beach Street, and Schirra Drive from "G2" to "L4" Industrial for a proposed musical performance venue (Introduced by Councilmember DiCicco on March 10, 2011).

Ms. Klevan stated you saw this as an information only item in October 2010. They propose to use two sites for a total of 7.1 acres. Currently there is a warehouse on each site. The venue would be handled by Live Nation, Inc. At the 2055 Richmond Street site, the ground floor of the venue will be 28,000 square feet and contain the box office, retail store, lounge, stage, concessions, back of stage and artist areas. The proposed 6,000 square feet mezzanine will include a wrap around balcony, restrooms, additional concessions areas and luxury boxes. It will also include 130 parking spaces. The other site, at 2225 Richmond Street, the warehouse will remain. The developer proposes to maintain the light industrial use in the existing building and utilize the parking area as a parking lot for the venue, which will provide an additional 290 parking spaces. The developer also proposes to use two neighboring lots, which are currently developer controlled, for an additional 230 parking spaces. An additional 280 on-street parking spaces exist, making the total available parking approximately 930 spaces. Both directional signage and temporary way finding signage is proposed. Cumberland Street is seen as a border between industrial redevelopment to the north and potential non-industrial redevelopment to the south. Landscaping will not be required. The Planning Commission staff recommendation is approval.

Public comments were made by Ron Patterson, Esq. attorney for the developer, Mike Grozier from Live Nation, Inc., David Grasso the developer, Craig O'S opposing it, Titan Smith supports it, and Isaac Freeze (resident) supports it. Letters of opposition submitted by Fishtown Neighbors Association, and Olde Richmond Civic Association (see "Exhibits 10A and 10B").

A question and answer session ensued between Mr. Eiding, Mr. Grasso, Mr. Jastrzab, and Ms. Miller.

Upon motion by Mr. Eiding, seconded by Ms. Rogo Trainer, the City Planning Commission approves Zoning Bill No. 110185.

- 11) Streets Bill No. 110157: Relocates the northern curb line of Benjamin Franklin Parkway and portions of curb lines in the area bounded by 20<sup>th</sup> and 21<sup>st</sup> Streets, the Parkway and Pennsylvania Avenue to establish

curb bump-outs and modify corner radii (Introduced by Councilmember Clarke on March 3, 2011).

Sarah Chiu, Development Planning Division, this Bill authorizes the revision of lines and grades on a portion of City Plan No. 63 by relocating the northeasterly curblines of Benjamin Franklin Parkway, from Twentieth Street to Twenty-first Street, two feet southwestwardly and relocating portions of certain curblines within the area bounded by the Benjamin Franklin Parkway, Bump-outs at 21<sup>st</sup> Street, the Parkway, Pennsylvania Avenue, and 20<sup>th</sup> Street. Corner will have bump-out. New curb line has been established in the Benjamin Franklin Streetscape Improvement Plan. The Planning Commission staff recommendation is approval.

Upon motion by Mr. Eiding, seconded by Ms. Rogo Trainer, the City Planning Commission approved Streets Bill No. 110157.

Mr. Syrnick adjourned the City Planning Commission Meeting of April 19, 2011 at 4:50pm.

## SUMMARY

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- 1) Approval of the Minutes of the March 15, 2011 meeting. Approved
- 2) Executive Director's Update.
- 3) Briefing on 2010 Census Population Data (Presented by Jametta Johnson)  
Presented
- 4) Acceptance of the Yorktown Master Plan 2015 (Presented by David Fecteau).  
Accepted
- 5) Update on the Draft Citywide *Philadelphia2035: Comprehensive Plan*.  
(Presented by Alan Urek). Presented
- 6) Model Cities Urban Renewal Plan Amendment: Authorizing the acquisition of 54 properties in North Philadelphia on the block bounded by 21<sup>st</sup> Street, 22<sup>nd</sup> Street, Cecil B. Moore Avenue, and Nicholas Street, for redevelopment as a health and wellness center. Also proposed for acquisition is 2804 W. Oakdale Street, to be included in a PHA residential development project (Presented by David Fecteau) Approved
- 7) Parkside-Lancaster Urban Renewal Plan Amendment: Authorizing the acquisition of 54 properties in West Philadelphia in the vicinity of 52<sup>nd</sup> Street and Parkside Avenue, for redevelopment as affordable multi-family rental and homeownership units and a community garden (Presented by Andrew Meloney).  
Approved
- 8) Development Proposal for 8<sup>th</sup> & Walnut Streets:
  - a) Zoning Bill No. 110184: amending the Zoning Code and remapping the area bounded by Walnut, 8<sup>th</sup>, Locust, and 9<sup>th</sup> Streets from "C4" to "C5" Commercial (Introduced by Councilmember DiCicco on 3/10/11; Presented by Larissa Klevan) Approved
  - b) Streets Bill No. 110231: Proposes two encroachments onto 8<sup>th</sup> and Walnut Streets (Introduced by Councilmember DiCicco on 3/24/11; Presented by Larissa Klevan) Approved
- 9) Chestnut Hill College IDD Master Plan approval (Presented by Martin Gregorski) Approved
- 10) Zoning Bill No. 110185: Amending the Zoning Code and remapping the area bounded by Richmond Street, Cumberland Street, Beach Street, and Schirra Drive from "G2" to "L4" Industrial for a proposed musical performance venue (Introduced by Councilmember DiCicco on 3/10/11; Presented by Larissa Klevan) Approved
- 11) Streets Bill No. 110157: Relocates the northern curb line of Benjamin Franklin Parkway and portions of curb lines in the area bounded by 20<sup>th</sup> and 21<sup>st</sup> Streets, the Parkway, and Pennsylvania Avenue to establish curb bump-outs and modify corner radii (Introduced by Councilmember Clarke on 3/3/11; Presented by Sarah Chiu) Approved



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**Margie A. Pierce,**  
**Executive Director**

**Benjamin Jennings,**  
**Board President**

"EXHIBIT 4A"

April 18, 2011

Mr. David Fecteau, AICP  
City Planning Commission  
1515 Arch Street  
13<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19102

RE: Yorktown Community Neighborhood Plan

Dear Mr. Fecteau:

The West Poplar Neighborhood Advisory Committee is in support of the "Yorktown Master Plan 2015," developed by V. Lamar Wilson Associates for the Yorktown Community.

The plan is a comprehensive blueprint which takes into account Yorktown's history and legacy, neighborhood demographic profile, community building and environmental and quality of life improvements.

Please feel free to contact us if you have any questions regarding our commitment or support of this plan.

Sincerely,

Margie A. Pierce, Executive Director  
West Poplar Neighborhood Advisory Committee



"EXHIBIT 4B"

Reverend Kevin R. Johnson  
Senior Pastor

19 April 2011

Philadelphia City Planning Commission  
1515 Arch Street, Room 18029  
Philadelphia, PA

To the Members of the Philadelphia City Planning Commission:

I have reviewed the Yorktown Master Plan for 2015, *A Blue Print for Survival and Sustainability*. I fully support this initiative led by Ms. Priscilla Woods and the Yorktown community. I believe that the Yorktown Master Plan for 2015 provides a road map toward effectively engaging in collective community development.

I urge you to support it for the good of all in our community.

Sincerely yours,

Reverend Kevin R. Johnson, Ed.D.  
Senior Pastor

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"EXHIBIT 5A"

**DRAFT 2035 CITYWIDE PLAN**  
**TESTIMONY TO THE CITY PLANNING COMMISSION**  
**APRIL 19, 2011**

**PRESERVATION ALLIANCE FOR GREATER PHILADELPHIA**

The Preservation Alliance greatly respects that amount of effort that the City Planning Commission staff has put into the Draft 2035 Citywide Plan. The document contains a great deal of information and reflects meetings that the staff has had with different interest groups and residents as well as analysis of data. The Preservation Alliance feels that the comprehensive and district planning efforts are important for the city and we have tried to organize some of our own activities to help neighborhood organizations contribute information about historic resources. We look forward to working with the Planning Commission staff as this process moves forward.

Nonetheless, we find the Draft 2035 Citywide plan disappointing and find the treatment of historic preservation to be extremely disappointing. The Draft Plan shows a surprising lack of understanding of the role historic preservation has and can plan in the economy and revitalization of Philadelphia. The Alliance feels that this draft needs to be substantially reorganized and rewritten to address broad issues, including those raised by the Coalition of Crosstown Neighborhoods, and to substantially revise the manner in which historic preservation is included.

1. The three themes selected as an organizational structure for the draft do not reflect the realities facing Philadelphia in coming years or the priorities for planning and public policy that those realities suggest. Nor do they provide a framework that is easily applicable to the development of district plans. In presentations the staff has referred to the concept of "building from strengths" as an underlying idea. But this concept is not carried through in the document, nor are the true strengths of the city clearly identified.

In the coming years Philadelphia needs to take actions that will preserve its strengths and assets, enhance those strengths and extend the impact of them to other sections of the city. If this is done effectively it could provide the basis for more ambitious undertakings that would be appropriate to help the city "thrive." Preserve, Enhance and Extend Impact are more appropriate organizing themes and more readily applicable to district plans.

2. The historic character of Philadelphia and its historic resources are one of Philadelphia's greatest strengths. It is perhaps one of the three or four most important strengths of the city and should be acknowledged at the very outset of this document. The document shows a surprising lack of understanding of the

impact of historic preservation on the city. This is demonstrated by Table 8.1 on page 139. This table indicates the amount of investment from historic preservation tax credit projects over the past five years. The figures may be accurate (they come from a report prepared for the Alliance) but the choice of information gives an inaccurate picture of the impact of historic preservation. Econsult's report on the *Economic Impact of Historic Preservation 1999—2009* examines a much broader range of preservation activities and documents \$6.8 Billion of investment in Philadelphia as a result of historic preservation activities.

I will not take the time to list the details of these activities but it should be noted that historic preservation has transformed entire neighborhoods, has produced housing for all income levels including 75% of all the housing added in the past decade to Center City and adjacent neighborhoods. It has transformed commercial districts, provided the majority of Center City hotel rooms to support the convention center, created major employment centers such as the Navy Yard or the recent IRS headquarters in the former Post Office. It has produced new cultural facilities and it is of course the absolute basis of Philadelphia's tourism industry. Most of these impacts and benefits of historic preservation are not even noted in the draft plan. Consequently the objectives stated in the section on historic preservation and the benefits noted in the benefits matrix are a substantial understatement of the role and impact of historic preservation in Philadelphia in the future and the benefits that can be derived from that.

3. A reorganization of the report along the themes of Preserve, Enhance and Extend Impact would also provide the opportunity for the important role of historic preservation to be recognized early in the report, to be described in more accurate detail in an expanded section on historic preservation, and to be reflected more accurately in the summary of benefits.

4. This report is an important document. The time schedule proposed for adoption of this document is hasty and does not allow adequate time for discussion and revisions. The Alliance supports the Crosstown Coalition's request that the City Planning Commission take adequate time to have public discussion of the document and to distribute revised drafts for comment before presenting a document to the Commission as the framework for future planning.

**PHILADELPHIA 2035 DRAFT CITYWIDE PLAN  
GENERAL COMMENTS AND COMMENTS ON  
HISTORIC PRESERVATION**

**Preservation Alliance for Greater Philadelphia  
April 2011**

The Preservation Alliance appreciates the effort the City Planning Commission staff has made in preparing the Draft Philadelphia 2035 Citywide Plan. The Draft Citywide plan contains much useful information and demonstrates that the Planning Commission has tried to think very broadly about issues and goals. It also indicates that the Commission has engaged different constituents in discussing ideas that might contribute to the plan. We respect this work and the commitment of the staff to this project.

The Preservation Alliance has tried to organize some of its own work so as to compliment the work of the City Planning Commission and to be able to contribute to the development of District Plans. We have therefore looked carefully at the current document and the way in which historic preservation is presented. Our comments are critical. However, we hope that they will be understood as constructive criticisms intended to help produce a stronger document and a clearer framework for District Plans.

This memorandum contains two sections. The first consists of general comments about the Draft Plan document as a whole; the second consists of more specific comments about the way historic preservation is represented in the Draft Plan.

**A. GENERAL COMMENTS**

1. The document is titled both Philadelphia 2035 Comprehensive Plan and Citywide Plan. It is not clear what the two titles mean.

- This document is not a comprehensive plan as defined by the City Charter, nor is it a “plan” for the city as a whole. It is a broad list of objectives and a selection of previously proposed projects.
- In a recent meeting, the Executive Director of the Planning Commission said that this document is “a framework for future discussions” and a “starting point for the District Plans.” A “framework” is a more accurate title for the document and, if adopted as the title, would eliminate the need for discussion as to why it is not a “plan.”

- Even as a “framework” the document has serious deficiencies and its organizational structure does not seem conducive to serve as a guide to District Plans.

2. The document seems to suggest that the process toward a Comprehensive Plan is based on producing 18 district plans over 5 years that, when assembled together, will constitute the Comprehensive Plan.

- Past experience suggests that 18 district plans over 5 years is a very ambitious goal. From 1960 to 2000 plans were produced for only 3 of the 12 planning analysis districts. (Since plans for two areas were done twice you could say that there were 5 district plans done during that time period.)

3. There is a need for a comprehensive plan and it is not clear why one cannot be produced now.

- For both zoning and capital programming purposes, it is often necessary to ask “is it consistent with the Comprehensive Plan?” This document does not allow that question to be answered because there is no specific plan.
- Over the five years that district plans will be produced, a more specific plan to guide decisions in areas waiting to have district plans prepared. If plans are not produced for all 18 districts, a plan is needed to cover those areas of the city.
- Plans have been produced for many sections of the city that are still relevant and could be the basis for a Comprehensive Plan. Moreover, perhaps as much as 75% of the city is already built out in a form and land use that is acceptable and will not change substantially.

4. Even as a “framework for discussion”, the document does not express nor does it seem to be related to the realities currently influencing Philadelphia.

- Current state and federal government discussions suggest that unlike the 1960s no substantial public funding for urban development is likely to be available from these sources in the next ten years.
- There is no discussion of the implications of the closing of 50 schools, the partial closing of fire stations, the attempt to close libraries, the fact that the Planning Commission continues to state that the city is overbuilt with public facilities for the current population, the increase in the poverty population of the city or similar issues.
- Although education is not a physical development issue, the continued difficulties with the public school system are likely to have a significant impact on population growth or loss and neighborhood stability.

- Within this context even the selection of what is presented as a modest population growth of 100,000 seems less related to current realities than a stable population projection might be and leads to a plan that seems overly optimistic and overly aspirational, at least for the next ten years.

5. The themes Thrive, Connect, Renew do not seem to be an appropriate organizational structure and the structure suggests a reverse order of priorities.

- Current constraints suggest that over the next ten years Philadelphia needs to focus on preserving its strengths and enhancing its assets and extending the impact of these strengths into other areas of the city. It is unlikely that Philadelphia will “thrive” over the next ten years.
- A primary focus of a “framework for planning” should be the preservation and enhancement of those aspects of Philadelphia that are its strengths. An identification of these strengths and a clear strategy for their preservation and enhancement should be the first component of the document.
- Historic preservation or rather the preservation and adaptive use of historic resources is clearly one, although not the only one, of the city’s strengths and should be given a high priority at the very beginning of this document.
- Many of the components listed in the “Renew” section appear to be among the city’s strengths. Renew seems like an inappropriate word to describe these strengths and the need to preserve and enhance them. In addition, the order of the three themes suggests a priority that seems unrelated to the realities facing the city and a planning strategy for the next ten years.
- Once a short list of strengths is identified, the document should organize the lists of objectives that would preserve, enhance and expand those strengths in a manner that suggests activities that could be carried out as part of the District Plans.
- A last part of the document could include some larger, more ambitious and aspirational goals related to the theme “Thrive” that might be achieved if a strong base is built through preservation, enhancement and expansion of the impact of current strengths.
- Preserve, Enhance and Extend seem relate better to the needs of neighborhoods and provide a clearer guide for District Plans. These themes imply building from strengths, including such strengths as Center City, historic resources, and the city’s parks and open space system.

6. The document does not clearly identify Philadelphia’s assets or some of the key factors that have contributed to revitalization of the city in recent years.

- There is a surprising lack of understanding of the importance of historic resources and historic preservation to the economy of the city. This is addressed in more detail in the second part of this memorandum.
- Other strengths are not well defined or are treated as a low priority.

7. The document does not clearly identify certain critical needs for neighborhood revitalization that might be a high priority focus of District Plans.

- There is no recognition of the fact that there are thousands of occupied residential properties in the city in need of basic system and general property repairs to insure that these properties will not continue to be lost to abandonment. (The growing poverty level of the city makes this a critical issue. In fact, a truly “transformative idea” would be to bring 100% of occupied residential properties up to sound standards.)
- The document states that 72% of the vacant land and buildings is in private ownership and such properties are scattered widely throughout the city. The difficult implications of this ownership or a specific strategy to address this issue are not clearly presented. The map on page 43 seems to show more underutilized land than allocated land uses in 2035 in spite of what seem to be very ambitious assumptions about development opportunities leaving the impression that many neighborhoods will continue to contain a large amount of vacant and unmaintained land and buildings.

9. It is not clear how this document is a “starting point for the District Plans.”

- As previously noted, the themes Thrive, Connect and Renew do not appear to relate clearly to District Plans. Many districts will not “thrive” in the next ten years, thus the sense that this theme is given priority does not seem appropriate.
- Are the District Plans intended to address every objective in this document? That seems very ambitious for the time scheduled allocated to District Plans. Many of the objectives are not capable of being translated into physical development plans at a district scale. If not all items are to be addressed, what are the items to be included in a District Plan and how is this “framework” a guide for District Plans?
- As previously noted, the themes of Preserve, Enhance and Extend seem more appropriate to the city as a whole and more useable as a framework for District Plans.

8. While the cost estimates are interesting it is difficult to evaluate them individually. More importantly it is difficult to evaluate them by objectives without

information about existing levels of expenditure and existing allocations among local, state and federal sources.

- The Capital Budget recommended by the Planning Commission for the next six years is \$9 Billion or an average \$1.5 billion per year. The total costs in the plan seem to exceed that average annual cost. It would be useful to see how the current capital budget fits into the budget chart as a base of reference.

## **B. COMMENTS ON THE HISTORIC PRESERVATION**

As previously noted, the Preservation Alliance respects the work of the Planning Commission staff in preparing this document. Nonetheless, the manner in which historic preservation is presented in the Draft Plan is extremely disappointing and demonstrates a glaring lack of understanding of the important role that historic preservation has played in the revitalization of Philadelphia and consequently a lack of understanding of the importance of historic preservation to the future of Philadelphia. It is our view that the Draft Plan needs to be substantially revised and rewritten both in terms of its organizational structure and its content with respect to historic preservation. This includes the priority given to historic preservation at the start of the document, the specific description of historic preservation objectives, and the indication of the benefits of historic preservation in the tables at the end of the document.

### **1. BACKGROUND**

Historic preservation has contributed to the revitalization and physical development of Philadelphia in a number of different ways, few of which are clearly represented in the document. The following are some illustrative examples. (More specific examples and a documentation of economic benefits can be found in the Alliance's report *The Economic Benefits of Historic Preservation in Philadelphia 1999-2009*, prepared by Econsult Inc.)

#### **Neighborhood Revitalization**

- Old City was transformed from a moribund wholesale distribution area to a vital mixed-use neighborhood through the conversion of historic buildings to residential use. This was made possible by listing the neighborhood on the National Register and thereby providing access to federal investment tax credits for historic preservation and façade easements. Transformation of such other neighborhoods has also been the result of the historic character of residential properties.
- The neighborhoods with the highest property values in the city are those that are historic districts. And an earlier study by the City Planning Commission

found that a significant percentage of new residents moving to the city moved to neighborhoods with an historic character.

- Econsult's report on the economic impact of historic preservation indicates that property values in historic districts increase at a greater rate than those of other neighborhoods.

## **Housing**

- Adaptive use of historic buildings has contributed hundreds of units of low and moderate-income housing, apartments and condominiums to city neighborhoods, often returning vacant buildings to active use. (The Draft Plan includes Case Study 3.1.3a, page 87, of the adaptive reuse of an historic building for residential use inaccurately referring to this as land management rather than as historic preservation.) Often such housing development has transformed neighborhoods such as the Parkside Avenue area in West Philadelphia or the conversion of the Naval Home to residential use, which provided the basis for associated new development and spurred investment in the adjacent South of South neighborhood.
- According to figures published by the Center City District approximately 75% of the new housing units added to Center City (and immediate adjacent neighborhoods) resulted from the adaptive use of older historic buildings.

## **Commercial and Economic Development**

- The revitalization of Main Street in Manayunk was the result of listing the area on the National Register and thereby providing access to federal investment tax credits for rehabilitation.
- The revitalization of the Navy Yard was initiated by the adaptive use of historic properties also using federal investment tax credits, including such notably projects as Urban Outfitters corporate headquarters. This provided the base for encouraging new development in other portions of the Navy Yard site. (The discussion of the Navy Yard as a regional center makes little mention of historic preservation, nor does the description of Urban Outfitters development on page 74.)
- The majority of hotel rooms in Center City that support activities of the Convention Center and the tourism industry are located in historic buildings. The last two new hotels (and the next new hotel) in Center City were created by the adaptive use of historic properties.
- The renovation of the Main Post Office building for the IRS consists of an adaptive use of an historic property made feasible through the use of federal investment tax credits.

- Small commercial developers along West Girard Avenue initiated extension of the National Register District so as to facilitate investment in that commercial corridor.

### **Cultural Facilities**

- Adaptive use of historic properties has provided new cultural facilities including the Please Touch Museum at Memorial Hall and the performing arts center in the Baptist Temple at Temple University.
- Most of the major cultural institutions in the city are located in historic buildings that contribute to their attraction of visitors and residents.
- The Mishkan Shalom synagogue pictured on page 77 is another example of adaptive use of an historic property.

### **Heritage Tourism**

- As the document notes, Philadelphia's historic resources are the basis of its attraction to visitors.

Most of the aspects of historic preservation noted above are not emphasized in the Draft Plan.

Many of the historic preservation activities noted above are the result of the ability to combine federal investment tax credits for historic rehabilitation with private investment by listing properties and districts on the National Register. Table 8.1 indicates that over \$585 million was invested in Philadelphia over a five year period as a result of the federal investment tax credits. Yet on page 137 the text states the listing on the National Register is primarily "honorary," a statement clearly contradicted by the table. Moreover, by limiting Table 8.1 solely to tax credit projects, the document significantly understates the economic impact of historic preservation. Econsult estimates that over a ten-year period historic preservation in all its facets resulted in an investment of \$6.8 Billion dollars in Philadelphia and that this investment occurred in many different parts of the city. It is likely that real estate related preservation activities in 2010 provided an additional investment of between \$300 and \$350 million.

In the next decade, with limited public resources, historic preservation tax credits provide a strong incentive for private investment for which Philadelphia with its broad range of historic resources is well positioned to use. The failure to recognize this opportunity is one of the notable deficiencies of the draft document.

As noted in the General Comments, the themes “Thrive, Connect, and Renew” do not reflect the realities facing Philadelphia and the majority of its districts during the next ten years, nor do they provide an organizational structure easily adapted to District Plans. Consideration should be given to reorganizing the report around a different set of themes.

## **2. HISTORIC PRESERVATION OBJECTIVES**

If the themes of Preserve, Enhance and Expand were adopted as the organizing elements of the document, historic preservation objectives would be organized around those themes. For the purposes of suggesting some of the relevant historic preservation objectives that should be included in the document, objectives are listed here by the categories used to provide background information about historic preservation and stated in a manner that suggests how they could guide District Plans. This list that follows is not intended to be all-inclusive . It includes many of the objectives listed on pages 139, 141 and 142 and others listed there are also appropriate to be included as historic preservation objectives.

### **Neighborhood Revitalization**

- Expand the jurisdiction of the Historical Commission to have review authority over all new construction in historic districts so as to insure compatibility with the character of the district.
- Increase the number of historic districts listed on the Philadelphia Register to increase property maintenance standards and support increased property values. (Identification of potential historic districts could be a focus of the District Plans.)
- Increase the designation of individual buildings in sections of the city and time periods underrepresented in the Philadelphia Register. This would include buildings of the 19<sup>th</sup> and 20<sup>th</sup> centuries, a more important focus than industrial buildings mentioned in the document. (Also could be a focus of the District Plans.)
- Inventory major buildings in residential neighborhoods currently or expected to become vacant and develop strategies for their reuse, including listing on the National Register so as to gain access to federal investment tax credits. This would include such properties as school buildings, churches and former commercial/ industrial properties. (Also could be a focus for the District Plans.)
- Expand investment in and incentives for improvements to occupied housing in neighborhoods with a distinctive housing character. (District plans could identify residential blocks in need of such targeted investment.)

- Revise the Conservation District program so as to make it a more effective strategy to preserve the character of neighborhoods that have a distinctive architectural character but may not merit designation as an historic district. (Potential Conservation Districts could be identified in District Plans.)

### **Housing**

- Continue the ten-year tax abatement for residential development but limit eligibility to adaptive use of older and historic properties.
- Target CDBG funds for housing subsidies to historic properties that are listed on the National Register and can therefore gain access to investment tax credits.
- Increase CDBG investment in upgrading the condition of occupied residential properties and examine incentives to encourage homeowner investment in occupied properties.

### **Commercial and Economic Development**

- Complete inventories for existing and eligible National Register Districts so as to bring to the attention of developers properties that might be rehabilitated through the use of federal investment tax credits. (See the Alliance's report on National Register Historic Districts.)
- Nominate new National Register Districts for areas where access to investment tax credits would assist revitalization including commercial corridors and areas such as eastern North Philadelphia /Kensington, or where larger former commercial / industrial buildings still exist. (Potential National Register districts could be identified in District Plans.)
- Continue to strive to get the Pennsylvania legislature to create an historic tax credit program for investment properties.

### **Heritage Tourism**

- Expand opportunities for heritage tourism by giving greater recognition to historic resources and events of the 19<sup>th</sup> and 20<sup>th</sup> century and by increased attention to thematic and cultural historic resources and sites.
- Ensure that the immediate areas surrounding historic landmarks are attractive to visitors by creating special zones of review for development around such landmarks and protecting view sheds. (Could also be identified in District Plans.)

## Other

- Provide adequate funding to ensure all City-owned historic properties are properly maintained and that all are listed on the Philadelphia Register, including buildings declared as surplus city property.
- Incorporate historic preservation as a major component of the City Planning Institute so as to develop an ethic of stewardship and preservation among residents of Philadelphia.
- Identify and protect key archaeological sites.

## CONCLUSION

These comments are intended to suggest that the a planning framework more relevant to the current reality of the city and the needs of the next ten years at least might be better represent by themes that imply building from the current strengths of the city. The themes that seem to represent that approach are Preserve, Enhance and Extend. The successful application of those three themes to planning and development policies could provide the basis for a fourth theme, Thrive, that incorporates larger and more ambitious objectives. Other components of the Draft Plan document can be readily incorporated into this organizational structure.

Within that context, historic preservation should be recognized as one of the most important strengths and assets of the city and given high priority consideration in each of the thematic areas. Historic preservation should be recognized for its past and potential future contributions to neighborhood revitalization, housing, commercial and economic development, cultural facilities and tourism in a manner that explicitly guides the identification of historic resources and opportunities in District Plans.

### *Additional Comments*

Examples included in the section on historic preservation do not reflect major issues. The Reading Viaduct is not an historic preservation project nor is the preservation of historic industrial bridges as high a preservation priority as, for example, developing a strategy to adaptively re-use the 50 schools that will be closed in the next few years (all of which may be already listed on the National Register) or developing a strategy to address the possibility that up to 100 religious buildings may be closed (neither of which issue is mentioned in the document).

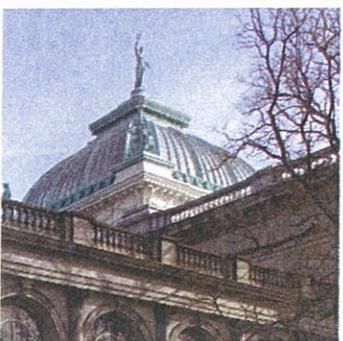
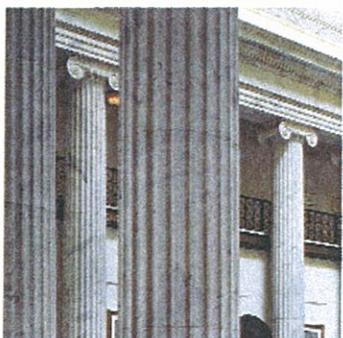
The chart on page 138 indicates that there are over 20,000 “properties” listed on the Philadelphia Register. It should be noted that this number includes each individual condominium unit in a condominium building even though that building would be thought of as one “property.”

# THE ECONOMIC IMPACT OF HISTORIC PRESERVATION IN PHILADELPHIA, 1999-2009

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Prepared for the Preservation Alliance for Greater Philadelphia  
By Econsult Corporation  
May 2010



# INTRODUCTION

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In 1998, the Preservation Alliance for Greater Philadelphia published “*The Economic Benefits of Preserving Philadelphia’s Past*.” This report examined the economic implications of several aspects of historic preservation with a primary focus on the economic benefits resulting from real estate projects that benefited from the federal historic rehabilitation tax credit. For the twenty-year period from 1978 to 1998, those projects resulted in more than \$1.5 Billion of expenditures, which produced 55,000 jobs and tax benefits to the city and state.

In 2009, the Preservation Alliance commissioned Econsult Corporation to update the previous report and to document the economic impact of a range of preservation-based real estate investments, as well as other historic preservation activities in Philadelphia, to both city and state government. Econsult was also asked to assess the impact of historic district designation on property values and surveys economic incentives for historic preservation currently used by other cities and states.

This document summarizes Econsult’s key findings. **The findings indicate that in the period from 1999 to 2009 over \$6.6 Billion was spent on historic preservation in Philadelphia, resulting in direct and indirect expenditures that generated a total of \$66 Million in tax revenues to the City of Philadelphia and an additional \$243 Million in tax revenues to the Commonwealth of Pennsylvania.** In addition, Econsult concluded that historic district designation has an immediate and lasting benefit on property values in historic districts. \*

*\* For the purposes of this report, economic impacts are defined as total direct and indirect expenditures, jobs created, earnings generated by those jobs and tax revenues derived from those earnings. Real estate tax revenues are not included since many projects completed during this period benefited from the city’s 10-year tax abatement program created in 1997. The Preservation Alliance and Econsult acknowledge that the data in this summary report and in the complete report is not necessarily all-inclusive because some data has not been kept consistently for the entire period or has not been kept for the city of Philadelphia independent of the Philadelphia region. Nonetheless, the data that is available is believed to give an accurate and most likely conservative estimate of the economic impacts generated by historic preservation activities in Philadelphia during this period.*

*Economic impact projections are based on economic models developed by Econsult Corporation, which are described in detail in the appendices of the full report. The full report, as well as the 1998 report can be found on the Preservation Alliance’s website at [www.preservationalliance.com](http://www.preservationalliance.com) under “Reports.”*

## SUMMARY OF FINDINGS

Historic preservation in Philadelphia had a significant economic impact in the past decade in the form of expenditures, employment, earnings and tax revenue to the city and state governments. The primary form of historic preservation activity is the adaptive re-use of historic properties or investment in the maintenance of historic properties. However, Philadelphia’s historic assets contribute significantly to tourism and to the city’s flourishing film industry.

### Economic Impacts of Real Estate Development

Real estate development associated with historic preservation consists of four types of activities: real estate development benefiting from the federal historic rehabilitation tax credits; conversion of historic properties to residential use without the use of tax credits; investment by private property owners; investment by government and non-profit entities.

Direct and indirect expenditures on these historic preservation real estate activities generated a total of **\$6.6 billion** in expenditures within the city of Philadelphia and **\$11.0 billion** within the Commonwealth of Pennsylvania. These expenditures produced employment and tax revenues for the City and Commonwealth indicated in Table A.

**Table A. Total Annual Economic Impact of Historic Preservation-Related Real Estate Development in Philadelphia, 1999-2009 (in 2010 Dollars)**

<b>TOTAL IMPACT, ALL PROJECT TYPES</b>	
<b>CITY OF PHILADELPHIA</b>	
Total Expenditures	\$6.6 Billion
Total Employment	28,400
Total Earnings	\$1.1 Billion
Total Local Tax Revenues	\$66 Million
<b>COMMONWEALTH OF PA</b>	
Total Expenditures	\$11.1 Billion
Total Employment	96,630
Total Earnings	\$3.5 Billion
Total State Tax Revenues	\$243 Million

*Note: expenditures, employment and earnings for Pennsylvania include those that take place in Philadelphia, but tax revenues for Pennsylvania are separate from Philadelphia.*

**Economic Impact of Heritage Tourism and film**

Both heritage tourism and film production directly benefit from Philadelphia's historic character and both industries produce significant economic benefits to the city and state. Tourism data is not maintained separately for the city of Philadelphia from the region as a whole. Heritage tourism in the five-county area has an over \$3.2 billion **annual** impact and supports 45,000 jobs and \$110 million in tax revenues **annually** for the Commonwealth of Pennsylvania. Even if only a small percentage of these expenditures occur within Philadelphia, the economic impact for the city is substantial.

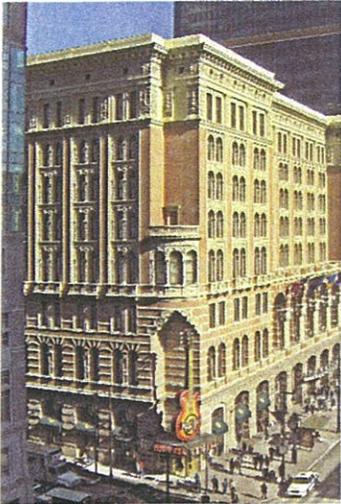
The flourishing film, television and video production industry generated \$116 million in direct spending in Philadelphia 2007 (the last date for which data is available), due in large part to Philadelphia's historic locations, and a total of \$632 Million in direct spending over the period from 1998 to 2007.

**Impact of Historic District Designation on Property Values**

Designation of a neighborhood as a Philadelphia Historic District has an immediate and long-term positive impact on property values. Property values in a district were found to increase 2% in the first year after district designation and to continue to appreciate at an annual rate 1% higher than that of the city average. Overall property values in historic districts are on average 22.5% higher than the average of other neighborhoods in the city.

# I. ECONOMIC IMPACT OF REAL ESTATE DEVELOPMENT

## DEVELOPMENT



Historic preservation consists of a variety of different types of real estate activity. To estimate the economic benefits of real estate development four types of activities were considered:

- Projects that benefited from the federal historic rehabilitation tax credits;
- Conversion of historic properties to residential use, without benefit of tax credits;
- Other private real estate development; and
- Investment by government and non-profit entities.

### PROJECTS THAT BENEFITED FROM FEDERAL HISTORIC REHABILITATION TAX CREDITS

Since 1976, the primary economic incentive for historic preservation in the United States has been the federal historic rehabilitation tax credit. Under this program, the rehabilitation of properties listed on the National Register of Historic Places qualifies for a 20% tax credit, provided the work is carried out in compliance with the Secretary of the Interior's Standards for Historic Rehabilitation and is approved by the National Park Service. Only income producing properties are eligible for the tax credits. However, this includes a wide range of buildings of varying sizes and historic periods developed for low-, moderate-income and market-rate rental housing, hotels, office and commercial buildings, theaters and similar facilities.

Pennsylvania has consistently been a leader in historic tax credit projects, due in large measure to the significant amount of preservation-related development in the city of Philadelphia. Philadelphia's success in utilizing the tax credits is made possible by the large number of historic districts and historic properties in the city listed on the National Register of Historic Places. As of 2009, there were 60 approved National Register districts in the city and 41 districts that have been determined eligible for listing on the Register. These contain a total of 22,000 and properties. While many of these are single-family residential properties, civic, institutional or religious properties, a large percentage are properties that are eligible for the federal tax credits, including such smaller properties as row houses in historic districts when used to provide rental housing. In addition to the properties in districts there are also 460 properties listed individually on the National Register that are also eligible for the federal tax credits.

In the period from 1999 to 2009 there were 204 tax credit projects in Philadelphia totaling \$1.5 Billion of direct investment in a variety of different types of real estate projects in a variety of different locations throughout the city. Examples of these tax-credit supported projects include:

#### Center City hotels

- |                                  |                |      |
|----------------------------------|----------------|------|
| • Marriott Philadelphia Downtown | \$72.3 Million | 1999 |
| • Ritz-Carlton Hotel             | \$82.8 Million | 2000 |
| • Marriott Courtyard             | \$61.4 Million | 2000 |
| • Loews Philadelphia Hotel       | \$61 Million   | 2001 |
| • Marriott Residence Inn         | \$74.5 Million | 2003 |

#### Center City commercial

- |                                |               |      |
|--------------------------------|---------------|------|
| • 801 Market Street (office)   | \$40Million   | 2003 |
| • 841 Chestnut Street (office) | \$43.9Million | 2004 |



### Center City residential

- Locust on the Park \$20 Million 1999
- Drake Tower \$25 Million 2001
- The Phoenix \$74.5 Million 2003
- Board of Education Building \$26 Million 2009

### Low and moderate-income housing

- Carl Mackley Apartments, Lower Northeast \$16.4Million 1999
- The Brentwood and others, Parkside \$12 million 2004
- Suffolk Manor, North Philadelphia \$18 Million 2004
- Vernon House, Strawberry Mansion \$7.4Million 2005

### Other:

- Spring Garden District \$8.1 million between 1999-2007
- Bernice Arms Apartments, Cobbs Creek \$4.7 Million 2000
- O.W. Holmes Junior High School conversion, West Philadelphia \$8.9 Million 2003
- Edward G. Budd Manufacturing Company, Nicetown \$32.2 Million 2006
- Philadelphia Navy Yard, 11 buildings including Urban Outfitters Corporate Headquarters \$104 million between 2004 and 2009



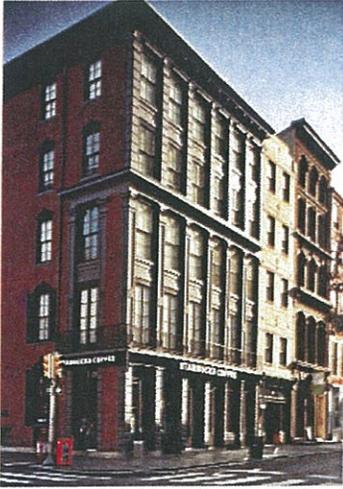
Some of these projects have had transforming impacts on sections of the city or on important economic sectors. Tax credit projects, led by Urban Outfitters investment in its corporate headquarters, transformed the former Navy Yard in South Philadelphia into an important business center. In Center City, the over \$350 Million invested in tax credit-supported conversion of historic properties to hotels has been a critical factor in supporting the city's hospitality and tourism industry.

One indication of the distribution of tax credit projects throughout the city can be seen by the amount of tax-credit investment in City Council districts. Projects were located in six of the ten council districts with the greatest investment in those districts that include portions of Center City (Districts 1, 2 and 5).

- District 1: \$371,815,338
- District 2: \$248,942,001
- District 3: \$131,125,066
- District 4: \$38,583,669
- District 5: \$631,385,674
- District 7: \$16,389,064
- District 8: \$26,891,064

For Philadelphia, projects utilizing the federal tax credits from 1998 to 2009 had a total economic impact of \$2.2 billion generating the employment and tax revenues for the city and Commonwealth shown in Table B.





**Table B. Estimated Total Economic Impact Resulting from Investment in Projects in Philadelphia that Benefited from Federal Rehabilitation Tax Credits, 1999-2009 (in 2010 Dollars)**

TOTAL IMPACT, ALL PROJECT TYPES	
<b>CITY OF PHILADELPHIA</b>	
Direct Expenditures	\$1.5 Billion
Total Expenditures	\$2.2 Billion
Total Employment	9,600
Total Earnings	\$360 Million
Total Local Tax Revenues	\$22 Million
<b>COMMONWEALTH OF PA</b>	
Direct Expenditures	\$1.5 Billion
Total Expenditures	\$3.7 Billion
Total Employment	32,300
Total Earnings	\$1.2 Billion
Total State Tax Revenue	\$82 million

*Note: expenditures, employment and earnings for Pennsylvania include those that take place in Philadelphia, but tax revenues for Pennsylvania are separate from Philadelphia.*

### CONVERSION OF HISTORIC PROPERTIES TO RESIDENTIAL USE

Since the passage in 1997 of a 10-year tax abatement program, investment in historic properties has been the leading factor in the creation of new housing in and adjacent to Center City. According to figures compiled by the Center City District, investment in older properties between 1998 and 2008 produced 4,187 apartment units and 3,326 condominium units. It is likely that some, but not necessarily all, of the apartment projects took advantage of the federal tax credits for historic rehabilitation. However, condominium projects are not eligible for the tax credits and consequently consist of an entirely new component of investment. A sampling of projects since 2000 identified 40 major condominium projects that converted historic properties to residential use resulting in \$500 million of direct investment. This sampling focused primarily on larger projects and is probably a conservative estimate since many smaller-scale projects could not be easily identified. Among the many condominium conversions have been:

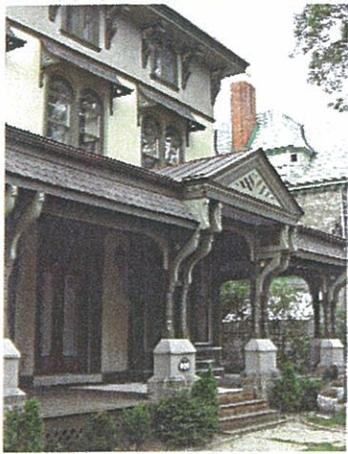
- 428-40 N. 13th Street, 2001                      \$13.2 Million
- The Lanesborough, 2003                              \$36 Million
- Merchants Row, 2003                                \$6 Million
- Victory Building, 2004                                \$25 Million
- The Ayer, 204 W. Washington Square, 2007    \$60 Million

For Philadelphia, these residential conversions have had a total economic impact of \$1.2 billion generating the employment and tax revenues for the city and state shown in Table C.

### OTHER PRIVATE REAL ESTATE DEVELOPMENT

There is a significant amount of preservation-related real estate investment in Philadelphia apart from federal tax-credit projects and the conversion of historic properties to residential use. Owners of historic properties are continuously investing in everything from small-scale additions and renovations by individual homeowners to larger renovation projects by commercial property owners.

In order to estimate the economic value of that activity, Econsult analyzed the level of permit activity for properties listed on the Philadelphia Register of Historic Places, and therefore regulated by the Philadelphia Historical Commission. It is important to note that not all renovations to existing historic properties require approval of the Philadelphia Historical Commission. For example, many properties in National Register Districts are not listed on the Philadelphia Register and therefore do not require



**Table C. Estimated Total Economic Impact Resulting from Residential Conversion Projects, 1999-2009 (in 2010 Dollars)**

TOTAL IMPACT	
<b>CITY OF PHILADELPHIA</b>	
Direct Expenditures	\$780 Million
Total Expenditures	\$1.2 Billion
Total Employment	4,900
Total Earnings	\$190 Million
Total Local Tax Revenues	\$12 Million
<b>COMMONWEALTH OF PA</b>	
Direct Expenditures	\$780 Million
Total Expenditures	\$1.9 Billion
Total Employment	16,700
Total Earnings	\$610 Million
Total State Tax Revenue	\$42 Million

*Note: expenditures, employment and earnings for Pennsylvania include those that take place in Philadelphia, but tax revenues for Pennsylvania are separate from Philadelphia.*

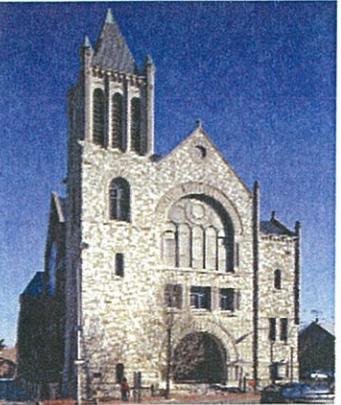
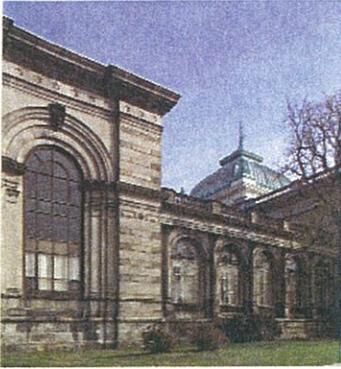
**Table D. Estimated Economic Impact of Investment in Other Real Estate Projects, 1999-2009 (in 2010 Dollars)**

AVERAGE ANNUAL IMPACT		TOTAL PROJECTED IMPACTED
<b>CITY OF PHILADELPHIA</b>		
Direct Expenditures	\$175 Million	\$1.75 Billion
Total Expenditures	\$257 Million	\$2.57 Billion
Total Employment	1,100	11,000
Total Earnings	\$42 Million	\$442 Million
Total Local Tax Revenues	\$ 2.6 Million	\$26 Million
<b>COMMONWEALTH OF PA</b>		
Direct Expenditures	\$175 Million	\$1.75 Billion
Total Expenditures	\$427 Million	\$4.27 Billion
Total Employment	3,710	37,100
Total Earnings	\$137 Million	\$1.37 Billion
Total State Tax Revenue	\$9.4 Million	\$94 Million

*Note: expenditures, employment and earnings for Pennsylvania include those that take place in Philadelphia, but tax revenues for Pennsylvania are separate from Philadelphia.*

Historical Commission approval. Nonetheless, the level of permit activity for properties listed on the Philadelphia Register is a good measure of this additional investment.

In the period from 2004 to 2009, the Historical Commission processed on average applications for more than 1,000 projects totaling an estimated \$175 million annually in direct expenditures. It is likely that some of these projects included tax-credit projects and non-tax credit residential conversions. Assuming, however, that this level of activity were consistent over the period from 1998 to 2009, the total economic impact of these other real estate investments is likely to have been \$2.57 billion as indicated in Table D.



## INVESTMENT BY GOVERNMENT AND NON-PROFIT ENTITIES

Rehabilitation and conversion of historic properties by government and such non-private entities as cultural institutions, universities and community-based non-profit organizations constitutes another significant source of investment in historic preservation in Philadelphia. Once again, there is no consistent source of information about such projects for the period from 1998 to 2009. A sample of institutions undertaken by Econsult indicated that during this period there were more than 40 major such projects in Philadelphia through mid-2008, totaling more than \$320 million in direct expenditures. Among the many significant projects were:

### Government:

- City Hall \$80 Million

### Nonprofit

- Please Touch Museum \$88 Million
- Masonic Library and Museum of Pennsylvania \$7.7 Million
- The Ruth and Raymond G. Perelman Building \$90 Million
- Chestnut Hill Academy \$8.8 Million
- Congregation Rodeph Shalom \$5.8 Million
- Mother Bethel AME Church \$1.3 Million
- Union League \$5.1 Million
- Eastern State Penitentiary Historic Site \$1.4 Million
- Rosenbach Museum and Library \$6 Million

Additional projects completed in 2008 and 2009 would most likely result in approximately \$450 million of direct expenditures and the employment and tax revenue indicated in Table E.

**Table E.** Estimated Total Economic Impact of Expenditures by Government and Non Profit Organizations, 1999-2009 (in 2010 Dollars)

	TOTAL IMPACT
<b>CITY OF PHILADELPHIA</b>	
Direct Expenditures	\$450 Million
Total Expenditures	\$670 Million
Total Employment	2,900
Total Earnings	\$110 Million
Total Local Tax Revenues	\$6.7 Million
<b>COMMONWEALTH OF PA</b>	
Direct Expenditures	\$450 Million
Total Expenditures	\$1.1 Billion
Total Employment	9,600
Total Earnings	\$350 Million
Total State Tax Revenue	\$24 Million

*Note: expenditures, employment and earnings for Pennsylvania include those that take place in Philadelphia, but tax revenues for Pennsylvania are separate from Philadelphia.*

## II. HERITAGE TOURISM AND THE FILM INDUSTRY

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Historic preservation in Philadelphia has other quantitative benefits that derive from its qualitative values. By helping to maintain the unique character and urban form of the city, preservation contributes significantly to the region's tourism and film industries. In addition, historic preservation's role in revitalizing many Philadelphia neighborhoods, notably Center City, has attracted other forms of investment in non-historic properties and in new construction.

### Heritage Tourism

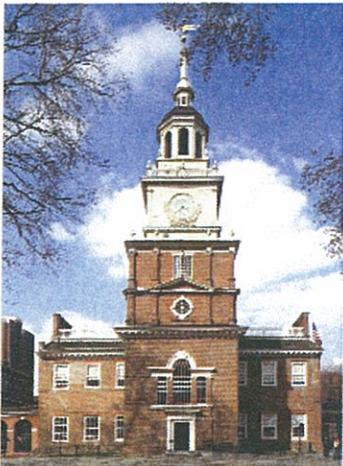
With its immense historic significance and preponderance of historic sites, Philadelphia is an important destination for international and domestic visitors. A 2008 report commissioned by the Greater Philadelphia Tourism Marketing Corporation found that the tourism industry in Philadelphia and its four surrounding Pennsylvania suburban counties was responsible for over \$10 billion in total expenditures in 2006, supporting over 128,000 jobs and almost \$4 billion in earnings, and generating almost \$1.5 billion in federal, state and local taxes.

Although no direct data exists on heritage tourism in Philadelphia, Econsult estimates that heritage tourism in Philadelphia represents at last 3.1 million visitors and \$1.5 billion in direct expenditures per year for the region, based on data from other studies. The total regional economic impact resulting from heritage tourism in Philadelphia is over \$3.2 billion per year in total expenditures supporting over 45,000 jobs and over \$970 million in earnings, as well as over \$110 million in tax revenues for the Commonwealth.

### The Film Industry

Philadelphia has grown to a favored location for movie, television and video productions, in large part because of the city's well-preserved historic sites, buildings and streets. It has become commonplace to see film crews shooting on streets with historic character and in historic buildings throughout Center City. Direct spending in Philadelphia attributable to film, television and video production was \$116 million in 2007, according to figures supplied to Econsult by the Greater Philadelphia Film Office. Over ten year period figures from the Film Office indicated a direct expenditure of \$632 Million.

Among the many productions that have used Philadelphia's historic environment as a backdrop since 1998 are *Law Abiding Citizen* (currently filming), *Arlen Faber* (2009), *It's Always Sunny in Philadelphia* (TV since 2005), *The Happening* (2007), *Hack* (2004), *In Her Shoes* (2004), *Hack* (TV 2002-2004), *National Treasure* (2003), *The Italian Job* (2002), *The Sixth Sense* (1998).



# III. IMPACT OF HISTORIC DISTRICT DESIGNATION ON PROPERTY VALUES

In 1985, Philadelphia's Historic Preservation Ordinance was amended to allow for the designation of historic districts, in addition to the designation of individual properties that had been allowed since the ordinance was first adopted in 1955. Since 1985 the Philadelphia Historical Commission has designated 13 districts, 10 of which are residential neighborhoods.

## Philadelphia Historic Districts (residential)

District	Date approved	Number of Properties
Diamond Street	1986	253
Rittenhouse / Fitler	1995	2,226
Girard Estates	1999	484
Society Hill	1999	1,361
Spring Garden	2001	1,463
Old City	2003	1,022
Greenbelt Knoll	2006	18
East Falls	2009	210
Parkside	2009	104
Awbury	2010	34



While it is generally recognized that designation as a historic district allows for the historic character of the district to be retained, it has often been unclear whether district designation has a positive economic benefit to property owners and, in turn, the City. Many studies on this issue have been completed for other cities. According to a literature review conducted by Econsult, the majority of these studies conclude that historic designations have a positive effect on property values.

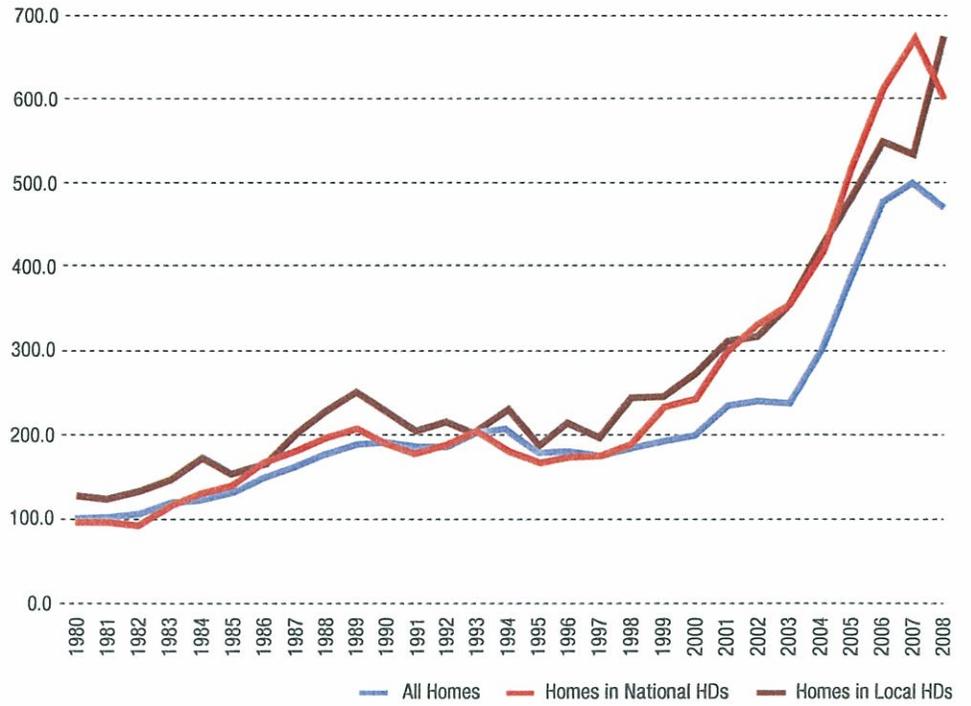
To test this hypothesis in Philadelphia, Econsult examined property values for both local and National Register Historic districts and conducted a regression analysis to determine the impact of district designation over time (see Econsult full report for a discussion of this methodology).

Chart A indicates the rate of increase in property values for all residential properties in Philadelphia and for properties in National Register and local historic districts. The chart indicates that homes within a locally-designated historic district in Philadelphia have sales prices on average 22.5% greater than homes in other sections of the city and homes in National Register historic districts have sales prices that average 14.3% higher than other neighborhoods.

The positive effect of historic designation on property values is both immediate and ongoing. Homes in local historic districts were found to enjoy an immediate two percent increase in property value relative to the city average once local designation is enacted; thereafter, they appreciate at an annual rate that is one percent higher than the city average. Given that average annual house price appreciation in Philadelphia historically tends to be between three and five percent over time, an additional one percent increase per year is meaningful.

Homes in local historic districts were also found to retain their value better during market downturns. According to December 2008 indices, residential properties in Philadelphia had fallen by 5.7% from their 2007 peak, but homes in local historic districts had fallen only 4.7% during the same time period.

**Chart A. House Price Appreciation Over Time (Indexed, 1980 = 100)**



Even proximity to a historic district was found to have a positive effect on property values. House prices increase by an average of 1.6% with each mile closer to a National Register historic district and by .5% with each mile closer to a local historic district.

To the extent that historic designation enhances property values, it enhances the wealth of property owners and can also lead to increased property tax revenues for the City.

# IV. RECOMMENDATIONS: ENHANCING THE ECONOMIC BENEFITS OF HISTORIC PRESERVATION IN PHILADELPHIA

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The economic benefits of historic preservation in Philadelphia documented in the Econsult indicate that these activities make a substantial contribution to the economy of the City of Philadelphia as well as to the Commonwealth of Pennsylvania. Yet neither the city nor the state provides incentives or invest in historic preservation that are commensurate with the economic benefits being returned. The City of Philadelphia provides tax incentives for historic preservation through the 10-year tax abatement program (although this is not exclusively to the benefit of historic properties), and through ten-year tax abatement on improvements to residential properties of under three units. Since 2006, the City has funded a grant program through the Preservation Alliance that provides grants to low and moderate-income owners of historic properties.

Currently, the Commonwealth provides no tax incentives for historic preservation, nor does it currently provide grants for non-profit organizations. Some historic properties have been recipients of grants from the state's Redevelopment Capital Assistance Program.

As part of its report, Econsult inventoried incentives for historic preservation in other cities and found an extensive array of programs that were being offered. One program used in many other states that could provide additional economic benefit to both the City and Commonwealth a state historic tax credit for historic preservation that could be used in conjunction with the federal historic preservation tax credits. Pennsylvania is one of only 20 states that does not offer such a tax credit and one of only 7 of the 26 states east of the Mississippi river that does not offer a state tax credit for historic preservation.

For several years, legislation has been introduced in Pennsylvania to create an historic preservation tax credit. In 2008-2009, HB 42 and its Senate counterpart had widespread support, including that of the Governor's office. These bills would have created a program with two types of economic incentives: a tax credit for developers of investment properties (hotels, apartments, commercial development, low and moderate income housing) and a grant program for homeowners making investments in owner occupied historic properties. The inclusion of a grant program for homeowners is of equal importance to Philadelphia. Such a program can extend the grant programs for home improvements already provided by the City and can part of a strategy to make historic homes more energy efficient.

The tax credit bills were reintroduced in 2009-2010 and deserve the full support of the state Legislature and of all who are interested in enhancing the economic benefits of historic preservation in Philadelphia and Pennsylvania.

## **CONCLUSION**

Historic preservation has been an important contributor to economic development and community revitalization efforts in Philadelphia. The 1998 study commissioned by the Preservation Alliance for Greater Philadelphia made a compelling case for the economic impact of historic preservation; the current report by Econsult strengthens this case:

**Historic preservation has had a significant impact on the economy** in the form of expenditures, employment, earnings and tax revenues to the city and state governments.

Historic preservation efforts also accrue a number of additional benefits to the City and Commonwealth, including bolstering the city's growing heritage tourism industry, attracting film and television opportunities, safeguarding cherished cultural resources, preserving the city's distinct urban form, and enhancing property values.

Accordingly, the economic benefits of historic preservation merit efforts by the City and Commonwealth to increase incentives for and investment in historic preservation.

Supported by grants from the Pew Center for Arts and Heritage/ Heritage Philadelphia Program and the William Penn Foundation.

### **Credits**

Econsult Corporation: Stephen Mullin, Lee Huang, Kevin Gillen

Summary edited by John Andrew Gallery and Elise Vider

Graphic Design: Willie Fetchko

Statement Before the Philadelphia City Planning Commission

April 19, 2011

I am Robert Vance, President of the Board of Directors of the Friends of the Wissahickon, and I am speaking today in opposition to Chestnut Hill College's Master Plan and IDD rezoning application. The College's proposed development of the Sugarloaf property and its main campus is one of the largest development projects in Chestnut Hill in recent years and the largest development project in decades that will have a significant impact on the portion of Fairmount Park known as the Wissahickon Valley.

The Friends of the Wissahickon (FOW) was formed in 1924, the same year that Chestnut Hill College was founded as Mount Saint Joseph's College. The FOW is the oldest and largest of the nonprofit, volunteer groups active in the Fairmount Park system. For over 86 years, the FOW has been a steward of the Wissahickon Valley, the beautiful northern stretch of Fairmount Park in the northwest section of the City. Our over 1,600 members maintain and preserve trails and historic structures, care for native plant and animal species, and protect the watershed.

As a matter of principle and policy, the FOW opposes IDD zoning for any property in or in close proximity to the Wissahickon Valley and the Wissahickon Watershed because IDD zoning allows for high density development that is environmentally destructive. Also, it has been our experience that despite the existence of the Wissahickon Watershed Ordinance, which imposes controls on development within the Wissahickon Watershed so as to minimize negative impacts on the watershed and maximize storm water regulation and control, the City does not always require strict compliance with the requirements of that Ordinance.

Recent research has shown that there are at least 15 properties in Chestnut Hill, some of which border on the Wissahickon Valley or the Wissahickon Watershed, that would be eligible for IDD zoning because they are at least three (3) contiguous acres in size. The College is the first of such property owners to seek the IDD zoning. Therefore, in our view, it is critical that we get this right the first time so that an acceptable precedent will be established.

The FOW opposes Chestnut Hill College's Master Plan and IDD rezoning application for the following reasons:

1. For the last 18 months, representatives of the FOW, CHCA, CHHS, CHBA, NWC, NCHN and a representative of the Houston family, have negotiated with the College in an effort to arrive at a three-part settlement that would allow the College to develop Sugarloaf and its main campus consistent with the community's desire to ensure environmentally-sensitive development and the protection and enhancement of Chestnut Hill's identity and historic fabric, with appropriate protections in the form of perpetual conservation easements over a large portion of Sugarloaf. The three parts of the settlement would be an agreed Master Plan, agreement on the appropriate zoning vehicle for the development, and a Community Development Agreement (CDA) among the College and the negotiating parties containing specific rights and responsibilities related to the development. The parties have not yet reached an agreement on any of the three component parts, although the negotiations with respect to each part are proceeding well.

- a. There is no agreement on IDD zoning or the terms of an IDD zoning ordinance. The College and the FOW fundamentally disagree on the density of the permitted development.

- b. There is no agreement on all aspects of the Master Plan.
- c. There is no agreement on the phasing of the perpetual conservation easements.
- d. There is no agreement on the critical terms of the Community Development Agreement, such as the impact of the sale of all or a portion of Sugarloaf or the main campus and the selection of the party to administer the perpetual conservation easements.

The College's unilateral decision to submit the application before you, in the FOW's view, was premature, ill-considered and unnecessary, particularly when negotiations have not yet resulted in an agreement.

2. The Master Plan violates the Wissahickon Watershed Ordinance. Sugarloaf and the College's main campus lie within the Wissahickon Watershed. As submitted, the College's Master Plan violates the Wissahickon Watershed Ordinance with respect to site coverage: the College proposes to exceed the site coverage for the most fragile land by 50% beyond what is allowed by the Ordinance. Also, the Master Plan contemplates construction on steep slopes, that is, slopes of 25% grade or greater, activity that the FOW opposes and that is environmentally destructive.

As a former Chairman of the Planning Commission, I know that this body has the power to stop this development from proceeding until there is total agreement between the College and the community negotiating parties on the Master Plan, the terms of the zoning, and the Community Development Agreement. I also know that you are not being asked to take any final action on the College's application at this time. However, it is important that each of you know what is at stake for the Wissahickon Valley and the Chestnut Hill community with this application. Because if you approve the College's proposed Master Plan and rezoning before there is agreement on those items with the FOW and the rest of the

negotiating parties, quite frankly, the College will have no incentive to agree to the items that we and other negotiating parties believe are crucial to provide protections to preserve the environmental beauty of the Wissahickon Valley and watershed and to protect the identity and historic fabric of Chestnut Hill.

I truly hope that by the time you are asked to take final action on this application in May I can appear here before you and state FOW's support for the application. However, we are not there yet.

I request that this statement be made a part of the official record of this meeting.

Thank you.

"EXHIBIT 9B"

Northwest-Wissahickon Conservancy  
9506 Marston Road , Philadelphia, PA 19118

**Statement Before the Philadelphia City Planning Commission**

April 19, 2011

I am George E. Thomas, Vice President of the Northwest-Wissahickon Conservancy and an historian of Philadelphia and its culture. Many of our members have immediate property interests in the area either abutting the college property directly or being across the street from the subject property and all of our members see the site on a daily basis. Today I am speaking on behalf of our organization which has spent thousands of hours in direct negotiation with Chestnut Hill College and our community groups. We oppose Chestnut Hill College's Master Plan and IDD rezoning application for the following reasons:

1. Because of its history and its beauty the subject site is already listed on the National Register of Historic Places for Fairmount Park and for the architecture of Chestnut Hill in which it is listed as a "significant" property. Further it incorporates a large section of the Wissahickon which is part of the only National Natural Landmark in the city. This site represents the special character of Chestnut Hill as a place that values the pairing of nature and design.
2. Because of its importance to the community and the city, the property has long been protected by deed restrictions. One calls for either park or single-family residential use. Another broader restriction applying to the entire Sugarloaf property calls for "preserving the natural beauty of the site and the context of the neighborhood." These deed restrictions are gifts to our community from people who loved the site and must not be ignored.
3. Further the site has special historic significance in this year of the sesquicentennial of the Civil War because it is the site of the only Civil War fortification in our city - one that was built by African American soldiers to defend the Germantown and Bells Mill Bridges from Confederate invaders in the summer of 1863. On this ground alone this site warrants special care and consideration.

The Northwest-Wissahickon Conservancy was formed in 2009 to bring together diverse groups within the community to explore the risks and impacts of the Institutional Development District in R-1 neighborhoods such as Chestnut Hill, to research and document the history of the site, and to evaluate and help modify the proposed College development plan. In discussions with our neighbors and important community institutions in the December and January of 2009-10 we reached two conclusions – that the IDD was the wrong tool for R-1 neighborhoods because it introduces destabilizing uncertainty into neighborhoods and further that the College plan was inappropriate in building far more than was sustainable given the environmentally critical site that is both a part of our city’s watershed and an Important Bird Area because of its role in migratory bird routes as determined by the Audubon Society (one of four in Pennsylvania).

We join with the Friends of the Wissahickon in “opposing IDD zoning for any property in or in close proximity to the Wissahickon Valley and the Wissahickon Watershed because IDD zoning allows for high density development” that is environmentally, culturally and economically destructive. We share their concern as well that the Water Department too often does not adhere to the letter of the law to protect critical sites such as this while the planning commission does not have a context-based planning method that is able to protect important settings and shape development to fit circumstance.

The beauty of this area is derived from the extremely low-density development (an FAR of .08) that juxtaposes relatively small houses with gardens and landscapes to form a special green entrance to our city. This character is unrecognized in the present Zoning code. Our residents contribute to the economic well-being of the city while preserving historic houses and institutions that are emblems of Philadelphia’s aspirations. Destabilizing this community and the many other neighborhoods of like character across the city through the use of the IDD will be a tragic net loss to the city in leadership, aesthetics, and economics.

Further the NWC joins the FOW in opposing Chestnut Hill College’s Master Plan and IDD rezoning application for the following reasons:

First, your approval of this masterplan and the college IDD application at this point will short circuit the negotiations that have been underway for the last 18 months. The goal of

our negotiations has been to arrive at a four-part settlement dealing with the masterplan, zoning category, community development agreement, and perpetual easements that would allow the College to develop Sugarloaf and its main campus consistent with the community's desire to ensure environmentally-sensitive development and to protect and enhance Chestnut Hill's identity and historic fabric.

Second, it is important that you know that in these negotiations, the college has repeatedly threatened to turn the property over for high-density development that would run the risk of damaging the north end of Chestnut Hill just as the tragic Chestnut Hill Village did to South Chestnut Hill half a century ago. This strategy on the part of the college represents an unwarranted abuse of the IDD program. The IDD is not intended as a speculative tool or a club to beat neighbors into submission but rather to encourage institutional growth. The college appears to be using the IDD application as a perverse negotiating tool to force acceptance of its one-sided community development agreement. At this point and with the college statement in mind, it is imperative that the PCPC slow the process to achieve a negotiated result that benefits the city, the community, and the college.

Third we are also concerned because the Master Plan that is before you today violates the Wissahickon Watershed Ordinance in multiple ways. Both Sugarloaf and the College's main campus lie entirely within the Wissahickon Watershed. As submitted, the College's Master Plan violates the Wissahickon Watershed Ordinance with respect to site coverage and building on steep slopes. The College proposes to exceed the site coverage for the most fragile land by 50% beyond what is allowed by the Ordinance while building much of their project on slopes of 25% grade or greater, activity that the FOW and the NWC opposes because it will be environmentally destructive. It will add to water runoff to the detriment of our properties and to the city's waterways and water supply.

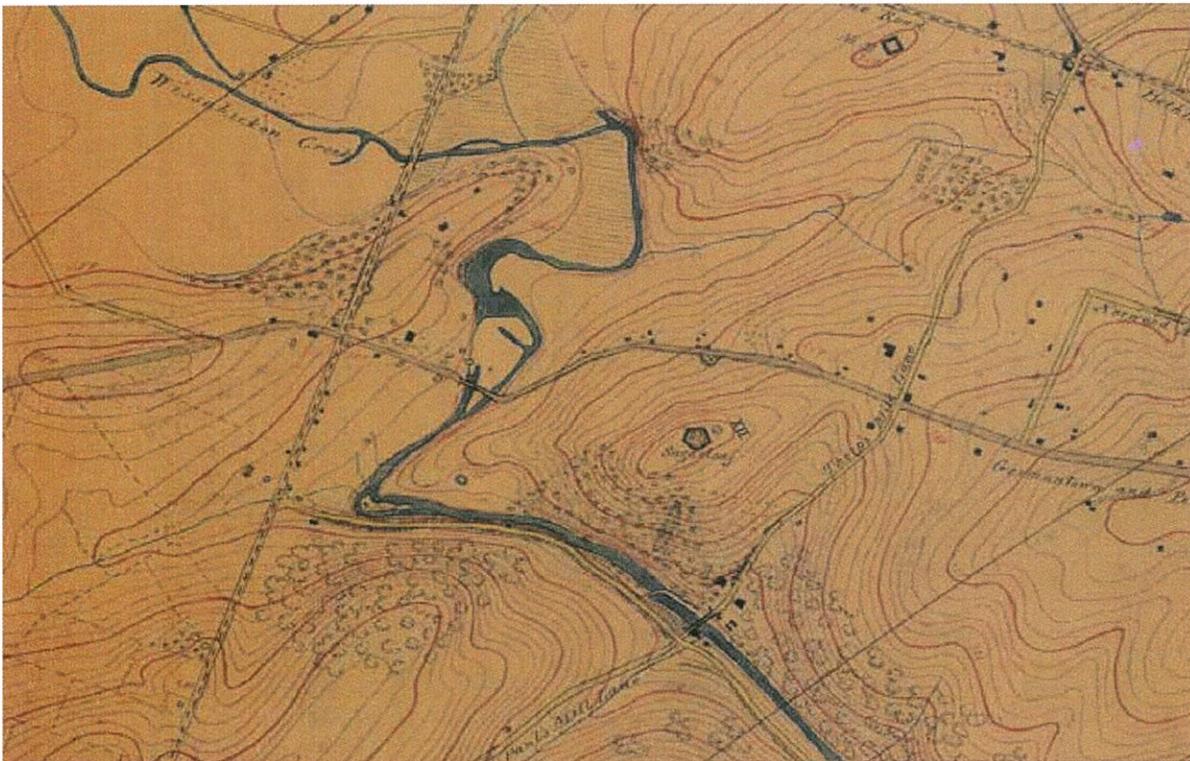
You have the power to slow this process until there is agreement between the College and the community negotiating parties on the Master Plan, the terms of the zoning, and the Community Development Agreement. If you advance their plan at this point the College will have no incentive to agree to the items that we and the other negotiating parties

believe are crucial to preserve the environmental beauty of the Wissahickon Valley and watershed and to protect the identity and historic fabric of Chestnut Hill.

We all hope that by the time this project is brought back to the PCPC we can appear here before you and state our support for the application. If however the college is asking that this be the final review it is further evidence of the failure of the college to work with their community. Until there is agreement there should be no advancement of this proposal.

I request that this statement be made a part of the official record of this meeting. Thank you.

George E. Thomas, Vice President for Northwest-Wissahickon Conservancy



1863 Civil War "Map of a reconnaissance of the approaches to Philadelphia showing the positions and lines of defense on the north front of the city."

*Map of a reconnaissance of the approaches to Philadelphia showing the positions and lines of defence on the north front of the city /Made under the direction of A.D. Bache, Supt. U.S. Coast Survey, Engineer in Charge of the Defences; general field reconnaissance by George Davidson, Assistant U.S. Coast Survey; details by George Davidson; assisted by C.M. Bache ... [et al.]; map plotted and drawn by George Davidson; assisted by A.R. FauntLeRoy and W.E. Weber. (Library of Congress, American Memory)*

"EXHIBIT 9C"

**STATEMENT OF NORTH CHESTNUT HILL NEIGHBORS  
TO THE PHILADELPHIA CITY PLANNING COMMISSION  
WITH RESPECT TO THE APPLICATION FOR AN IDD AND AN APPROVED  
MASTER PLAN FOR CHESTNUT HILL COLLEGE FOR SUGARLOAF  
LOCATED AT BELLS MILL AND GERMANTOWN AVENUE.**

**19 APRIL 2011**

**GOOD AFTERNOON, MR. CHAIRMAN AND MEMBERS OF THE  
PLANNING COMMISSION. I AM ROBERT J. SHUSTERMAN,  
PRESIDENT OF THE NORTH CHESTNUT HILL NEIGHBORS.**

**NORTH CHESTNUT HILL NEIGHBORS STARTED BACK IN THE 1940'S  
AND IS AN INTERMITTENTLY ACTIVELY GROUP THAT BECOMES ACTIVE  
WHEN A PROJECT OR ISSUE HAS A GREATER IMPACT ON NORTH  
CHESTNUT HILL OR WHERE THE POSITIONS OF THE NORTH  
CHESTNUT HILL RESIDENTS AND THE CHESTNUT HILL CIVIC  
ASSOCIATION DIFFER. NORTH CHESTNUT HILL GENERALLY REFERS  
TO THE AREA OF THE CITY EAST AND SOUTH OF THE WISSAHICKON  
AND NORTH OF CHESTNUT HILL AVENUE.**

**FROM THE 1980S UNTIL THE PRESENT, MUCH OF THE EFFORT OF  
THE NORTH CHESTNUT HILL NEIGHBORS RELATED TO BELLS MILL**

**ROAD TRAFFIC, THE CHESTNUT HILL HOSPITAL AND PARKING GARAGE EXPANSION AND THE PROPOSED EXPANSION OF WOODMERE ART MUSEUM). THESE TOUCH ON, OR ARE IN CLOSE PROXIMITY TO THE SUGARLOAF SITE CURRENTLY UNDER CONSIDERATION.**

**THE NORTH CHESTNUT HILL NEIGHBORS WERE SUCCESSFUL IN MAKING BELLS MILL ONE WAY FROM GERMANTOWN TO STENTON, CUTTING DOWN ON THE NUMBER OF ACCIDENTS, HOWEVER THE INTERSECTION OF BELLS MILL AND GERMANTOWN AVENUE, ONE OF THE ENTRANCES TO CHESTNUT HILL COLLEGE'S SUGARLOAF CAMPUS, STILL IS ONE OF THE MORE DANGEROUS INTERSECTIONS IN THE CITY.**

**THE CURRENT BOARD MEMBERS LIVE ACROSS FROM SUGARLOAF OR WITHIN 3 OR 4 HOUSES FROM THE SUGARLOAF PROPERTY. MANY OF THE OTHER ACTIVE MEMBERS OF NORTH CHESTNUT HILL NEIGHBORS LIVE ON BELLS MILL ROAD, GERMANTOWN AVENUE, HAMPTON AND GREENTREE STREETS. FROM MY HOUSE, I CAN SEE THE OVERLY BRIGHT NEW LIGHTING THE COLLEGE HAS INSTALLED ON THE ROADWAYS AND PARKING AREAS ON SUGARLOAF.**

**THE NORTH CHESTNUT HILL NEIGHBORS HAVE BEEN ACTIVE PARTICIPANTS IN THE NEGOTIATIONS WITH CHESTNUT HILL COLLEGE, AND HAVE RAISED ISSUES WITH THE COLLEGE ABOUT TRAFFIC AND ENVIRONMENTAL PROTECTION. IN THE EVENT THERE IS CONTINUAL GRIDLOCK SURROUNDING SUGARLOAF, THE STUDENTS AND VISITORS TO CHESTNUT HILL USING GERMANTOWN AVENUE CAN GO ELSEWHERE. WE CAN'T.**

**WE LIVE HERE. WE NEED ACCESS TO OUR HOMES FOR US, OUR VISITORS AND OUR GUESTS. WE ALSO NEED TO MAINTAIN A SUFFICIENTLY STRONG RESIDENTIAL FABRIC TO KEEP US A RESIDENTIAL COMMUNITY THAT, UNLIKE INSTITUTIONS, PAYS PROPERTY TAX TO THE CITY.**

**WE ARE NOT PRESENT IN LARGE NUMBERS BECAUSE WE HAVE HONORED THE COLLEGE'S REQUEST TO KEEP THE NEGOTIATIONS WITH THE COLLEGE PRIVATE. WE JOIN IN THE HOPE OTHERS HAVE EXPRESSED THAT A NEGOTIATED SETTLEMENT CAN BE REACHED WITH THE COLLEGE.**

**I WOULD ALSO LIKE THE COMMISSION TO EXPLAIN WHERE THE PCPC APPROVAL PROCESS STANDS AND WHAT ARE THE NEXT STEPS IN AN APPROVAL PROCESS.**

**IF THERE IS TO BE CONTINUING REVIEW BY THE PCPC, THE NORTH CHESTNUT HILL NEIGHBORS, AS WITH THE OTHER GROUPS THAT ARE PART OF THE NG, RESERVE THE RIGHT TO SUBMIT FURTHER COMMENT.**

**I REQUEST THAT THIS STATEMENT BE MADE A PART OF THE OFFICIAL RECORDS OF THIS MEETING.**

**THANK YOU.**

Statement re: CHC for 4/19 PCPC Preliminary Hearing

Good afternoon, Mr. Chairman and Members of the Planning Commission.

I'm Larry McEwen, Chair of the Chestnut Hill Community Association's Coalition Negotiating Group, a committee of representatives from seven independent organizations appointed by the CHCA Board to negotiate a mutually agreeable resolution of CHC's Master Plan for its Sugarloaf and Main Campuses. The seven parties represented by the Negotiating Group are:

- the **North Chestnut Hill Neighbors**, a group representing the broad interests of local citizens with a vested interest in the ecological health and preservation of unique community assets such as historic Bells Mill Road and the historic properties that front on Bells Mill Road including the Sugarloaf property;
- the **Northwest-Wissahickon Conservancy**, an educational and preservation group formed to assess the impact of Institutional Development District zoning on Chestnut Hill and the Wissahickon Valley, and to evaluate Chestnut Hill College's proposed development of the Sugarloaf property under such an ordinance;
- the **heirs of Henry Howard Houston**, whose estate in 1952 created a deed restriction on about 10 acres at the north end of Sugarloaf limiting the most environmentally sensitive area to single family houses or park use, and who share the goal of preserving the spirit and intent of that deed restriction. In exchange for lifting portions of that restriction, the heirs are negotiating a settlement that recognizes the considerable increase in value provided the College while supporting the limits on development desired by the community, especially the directly impacted near neighbors;
- the **Friends of the Wissahickon**, stewards of the adjacent Wissahickon Valley Park and of the Wissahickon Creek, a waterway that contributes drinking water for nearly one third of the City of Philadelphia;
- The **Chestnut Hill Historical Society**, which is dedicated to preserving and nurturing the historical, physical, and cultural resources, and the character of Chestnut Hill;
- the **Chestnut Hill Business Association**, a membership organization for the 125 retailers and restaurants located in Chestnut Hill; and
- the **Chestnut Hill Community Association**, representing 7500 residents of Chestnut Hill.

CHC's Sugarloaf Campus is the largest single property development in Chestnut Hill since the Morgan Tract in the 1960s. The members of the NG and the individual community organizations they represent have expended thousands of hours and significant financial resources retaining professional guidance over the past 18 months working with the College to reach agreement on a comprehensive, four-part development proposal comprised of: an acceptable Master Plan, a zoning strategy with appropriate density and use controls, a binding Community Development Agreement to provide assurance and protection for both sides, and perpetual Conservation Easements for the majority of the Sugarloaf site outside the Master Plan 'aquarium' or development area. The College's application comes at a time when negotiations on all of these elements are still ongoing. While there has been substantial progress toward the resolution of the Master Plan for the two campuses, we have not yet reached agreement on all aspects of the four-part development proposal. As a result, the negotiating group opposes this IDD application. Without resolution of these important issues and their supporting agreements, the plan that has been submitted to you for the Chestnut Hill College properties is not:

- Consistent with the Wissahickon Watershed
- Consistent with the language contained in all covenants currently running with the land (for example, the dormitories shown within the Houston Deed Restriction parcel are of institutional, not residential, use per the current Philadelphia Zoning Code).

- Consistent with the predominantly residential character of the community

Previously, we had voted to oppose the IDD. Any future acceptance of the IDD category for this site by the NG will only occur as a part of a global resolution which has yet to be reached. To avoid negative 'unintended consequences' the Planning Commission troubleshoots parcels it rezones, or new districts it advances for Council approval. We have great concern for, and have spent much time considering, those consequences at the Sugarloaf campus which is within an R-1 district, the most restrictive residential zoning district the City currently allows. We believe that a zoning strategy that sets context-based development controls is necessary, to be compatible with the scale and character of this setting.

We ask that before the PCPC acts on this application you review the zoning strategy with the College and Negotiating Group. Without resolution on this point, as well as the Master Plan, CDA and conservation easement issues, our opposition to the IDD application will remain.

We anticipate appearing before this Commission again during the formal hearing on this IDD application in its councilmanic ordinance format in May, and before any City Council public hearing. We will work diligently with our counterparts at Chestnut Hill College until that time to achieve agreement on the critical issues surrounding this proposed development and zoning change. However, your approval of their plan at this point diminishes the time during which agreement on the issues can be reached. .

One final point is important for you to understand. We have worked under a self-imposed news blackout to try to de-politicize this discussion. This will result in a limited number of people at these hearings but does not mean disinterest or lack of concern. Were the PCPC to approve this application without adequate discussion, there will be significant concern – which we continue to hope to avoid.

I request that this statement be made a part of the official record of this meeting. Thank you.

"EXHIBIT 10A"



**FISHTOWN NEIGHBORS ASSOCIATION**

P.O. Box 29292

Philadelphia, PA 19125

fna@fishtownlife.com

October 14, 2010

Gary Jastrzab, AICP, Executive Director  
One Parkway, 13<sup>th</sup> Floor  
1515 Arch Street  
Philadelphia, PA 19102

Re: Proposed Music Venue at 2055 Richmond Street

Dear Mr. Jastrzab and Commissioners:

I am writing you on behalf of the Fishtown Neighbors Association (FNA) to communicate the community's opposition to the proposed music venue at 2055 Richmond Street and the associated legislation introduced by Councilman DiCicco.

While the FNA has a significant membership, it is important to understand the procedures by which our civic organization's Zoning Committee runs community meetings related to zoning issues. The FNA Zoning Committee, and by extension the FNA as an organization, remain neutral on specific projects requiring zoning variances or changes. The Zoning Committee's role is to facilitate meetings between residents of Fishtown and developers needing zoning variances or changes. The developer presents the project, fields questions from the residents in attendance, and the meeting is concluded with a vote by anonymous ballot. These meetings are extremely well publicized by posting notices in the local papers, online forums and by distributing flyers. All residents and business owners within the FNA's boundaries are eligible to vote. The project site and nearly the entire overlay area lies within the FNA's recognized borders.

On August 31, 2010 the FNA hosted a well attended meeting related to this proposed project. In order to help residents form an objective opinion about the project, the FNA Zoning Committee asked several individuals to present information relevant to this project and the surrounding area. David Fecteau of the Philadelphia City Planning Commission presented information on the existing base zoning, overlays, and the Plan of Development regulations that the developer would be required to follow should the legislation go forward. Sarah Thorp, Masterplan Manager at the Delaware River Waterfront Corporation,

presented information on the current status of the Waterfront Masterplan. Councilman DiCicco graciously presented the background behind the legislation he introduced to City Council related to this project. Finally, David Grasso of Grasso Holdings presented his proposed project for a 2,600 person music venue including the sale of food and liquor and the provision of 650 off-street parking spaces.

A total of 95 eligible voters cast ballots and an estimated 120 individuals attended this meeting. The community voted to oppose the project with 57 residents voting in opposition and 38 voting in support.

The following were the primary concerns of the neighbors:

- While the project is immediately surrounded by light industrial uses, it is only 1,200 feet from residential areas. The neighborhoods of Fishtown and Old Richmond are primarily populated by 2 and 3-story single-family row homes.
- In conjunction with the new casino, this project presents another significantly auto-intensive use that effectively "bookends" the Delaware Avenue / Richmond Street corridor as it runs through Fishtown. In addition to the increased traffic, the proposed project would add another large surface parking lot to the area.
- While smaller in scale, this project presents the potential for unavoidable quality of life issues related to alcohol consumption, traffic, and crime that will compound those presented by the casino. Many residents were not convinced that this proposed use is qualitatively different from the night clubs that once existed along Delaware Avenue.
- Considerable time and effort have gone into developing the Civic Vision for the Delaware Waterfront and the soon-to-be-released Waterfront Master Plan. While it's unclear as yet how this proposal would relate to the Master Plan, it is clear that this use is inconsistent with many of the tenets of the Civic Vision:
  - The legislation required to make this project possible is a classic example of "spot zoning" which is inconsistent with the Civic Vision's directive to "adopt clear zoning, detailed master plan, and a coordinated regulatory policy."
  - The proposed use as a music venue is not an "active ground floor use" identified as a key attribute of the planning principles outlined in the Civic Vision.
  - The proposed use is auto-intensive requiring a relatively large amount of parking that would be provided as a primary use on an undisclosed, but presumably proximate parcel along the waterfront. The Civic Vision specifically discourages large tracts of unconcealed surface parking.
  - Comprehensive traffic management is a significant tenet of the Civic Vision Action Plan. While the proposal includes a study of existing traffic patterns as they relate to the immediate project site, it is unclear if the expectations of the applicant are consistent with those that will be outlined in the Waterfront Master Plan.

Thank you for considering our input.

Sincerely,

A handwritten signature in black ink, appearing to read 'MHanson', followed by a horizontal line and a shorter horizontal line below it.

Micah Hanson, AIA, Chair, FNA Zoning Committee

Cc: Hon. Michael G. O'Brien, PA House of Representatives, 175<sup>th</sup> District  
Hon. John Taylor, PA House of Representatives, 177<sup>th</sup> District  
Councilman Frank DiCiccio, First District  
Councilman Darrel Clarke, Fifth District  
Tom Potts, NKCDC  
Neil Brecher, President, FNA  
Peggy Weinman, President, ORCA  
Michael Fenerty, Zoning Co-Chair, ORCA  
Peg Rzepski, Zoning Co-Chair, ORCA  
David Fecteau, Philadelphia City Planning Commission

# Olde Richmond Civic Association

"A great place to live"

2174 East Sergeant Street  
Philadelphia, PA 19125

2620 East Thompson Street  
Philadelphia, PA 19125

October 15, 2010

Via Facsimile and U.S. First Class Mail

Alan Greenberger, AICP, Chairman  
Philadelphia Planning Commission  
One Parkway, 13th Floor  
1515 Arch Street  
Philadelphia, PA 19102

**Re: 2055 Richmond Street & Bill No. 100499**

Dear Chairman Greenberger and Members of the Commission:

Kindly accept this letter as a report of the **strong opposition** of the **Olde Richmond Civic Association** ("ORCA") with regard to both the proposed plan to open a nightclub/entertainment facility at the above referenced address and to Council Bill No. 100499 which would amend the Philadelphia Code and Zoning maps in order to exempt this project and similar future projects along the North Richmond Street corridor bounded by Cumberland Street and Schirra Drive from the North Delaware Avenue Special Controls District. As you know, the Special Controls District was created eight years ago by City Council in order to protect the residents of our community from the acknowledged adverse impacts of exponentially smaller similar projects.

A meeting was held at the Coral Street Arts House on August 2, 2010 at which time a developer presented a plan for a "live music venue" to be located at 2055 Richmond Street. The developer represented that the facility would hold at least 2500 people and would host "national" live music acts. However, the developer acknowledged that it would not be able to book such acts most nights and that he would often operate as a night club with a "deejay". Additionally, he also acknowledged that the facility would be available for rental use. While the developer's representations as to minor details of his business plan are continually evolving, the size, scope and location of the project remain the same and render the project inappropriate for and unacceptable to the community in which it shall be located.

Kindly be advised the proposed project and all of the area covered by the proposed legislation are located within this organization's boundaries. This is not true of any other organization. Please be advised that there are many residences located in close proximity to the proposed project and that the residents with whom we have discussed this project are uniformly opposed to both the project and the legislation exempting the surrounding area from both the Special Controls District and the zoning process which gives our community a voice with regard to such proposed uses.

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Olde Richmond Civic Association, Inc.  
serving the community within

The Delaware River - Trenton Avenue - The Railroad - York Street

*Planning Commission Letter re: 2055 Richmond Street & Council Bill No. 100499*  
October 15, 2010

As stated, the Special Controls District was created to protect the community from the acknowledged adverse impacts associated with such projects. Kindly be advised that the proposed project differs in only one way from the uses which led to the creation of the Special Controls District. The difference being that it is *exponentially larger* than any of the similar uses which the river front communities fought for so many years to eradicate.

Additionally, the developer's plans fail to take into consideration the ongoing burden that the community situated most proximate to the area in question is presently experiencing with regard to road redesign and reconstruction. Unfortunately, these hardships shall only increase during the next several phases of road redesign and reconstruction. This project and the enabling legislation will have a crushing impact upon the community bounded by the Delaware River, Aramingo Avenue and the Lehigh Avenue Railroad Corridor which is often referred to as "the Triangle." In fact, almost all of the adverse impacts of this project and those enabled by the legislation will be exclusively endured by this particular community.

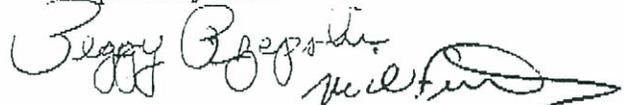
The residents of the surrounding communities also join us in opposition to this project. The Fishtown Neighbors Association ("FNA") has submitted a letter of opposition, dated October 14, 2010. Please be advised that community represented by ORCA shares all of the concerns listed in FNA's letter. A copy of FNA's letter is included herewith.

Further, we respectfully maintain that converting a large old warehouse into a massive nightclub/music venue and enabling other similar uses within the legislation's boundaries is not in keeping with the type of true, cohesive and visionary water front development that our community has been promised for so long. Rather, it is our position that this project and other such uses enabled by Council Bill No. 100499 shall only constitute a hardship, nuisance and blight upon our community.

Consequently, we respectfully request that the Planning Commission oppose the proposed project in order that the uniquely located subject property may be put to a more productive and appropriate use which benefits our entire community and City rather than causing harm in order to benefit so few.

Thank you for your consideration.

Respectfully Submitted,



Peggy Rzepski and Michael P. Fenerty,  
 Co-Chairs, Zoning and Special Richmond  
 Street Project Committees  
 Olde Richmond Civic Association

cc: Hon. Frank DiCicco, 1<sup>st</sup> District Councilman  
 Hon. Michael G. O'Brien, Pa. House of Representatives, 175<sup>th</sup> District  
 Hon. John Taylor, Pa. House of Representatives, 177<sup>th</sup> District  
 Thomas Potts, New Kensington Community Development Corp.  
 Peggy Weinman, President, ORCA  
 David Fecteu, Philadelphia Planning Commission