PROJECT 250

PROJECT 250 RESPONSE TO PARKS AND RECREATION COMMISSIONER QUESTIONS AND PUBLIC COMMENTS

i. INTRODUCTION

During the December 12, 2015 public hearing on Project 250, numerous questions and comments were presented to the Philadelphia Commission on Parks and Recreation ("Commission") and the Project team. It is not surprising that a Project as unique as ours has generated significant interest and requests for further information. The Project 250 team has reviewed the verbal and written comments submitted to the Commission and is pleased to submit the following details that address many of them.

MISSION

- Project 250's mission is to provide an indoor and outdoor recreational and character development hub, that provides cycling running, swimming and the appreciation of nature and the environment, in a setting that is a respite from the stress of home and urban life, as a basis for social development and healthy living without the use of City funding or taxpayer obligation.

WHY THIS MISSION?

- 76% of Philadelphia's school children do not have access to structured out of school time activities.
- The Cadence Foundation program has demonstrated significant success with dozens of Philadelphia's school children in what has been a *de facto* pilot program for parts of our mission.
- Many adults in Philadelphia do not have access to structured programming to develop healthy lifestyles and an appreciation of nature and the environment.
- Children and adults alike will benefit from a visual break from the repetitive grid of city streets and interstate highway infrastructure.
- A wave of interest in cycling is sweeping across the nation as it is around the world. Philadelphia, as are other major cities across the nation, is working on a bicycle-friendly infrastructure to support healthy lifestyles, traffic issues and recreation. The Project 250

mission will also allow Philadelphia to become the nucleus for the cycling community on the east coast drawing both national and international cycling attractions and activity to the City while providing a forum for local cycling-centered activities to the citizens of Philadelphia and the region.

BACKGROUND AND INTENDED ORIGINAL USE OF FDR PARK AND CURRENT STATUS

- In 1912, the Philadelphia Department of Public Works engaged the Olmsted Brothers Landscape Architectural firm to redesign what was then known as League Island Park in South Philadelphia.
- Olmsted had a national reputation for the design and construction college campuses. cemeteries, and parks that would provide a natural appearing visual barrier acting as relief from the stress and surrounding visual chaos of urban life.
- Olmsted's philosophy for his basis of design was that parks are an essential component of modern urban living that should provide an opportunity for escape from the monotonous grid and infrastructure of urban life. To that extent parks were designed to appear natural with rolling meadows, curving roads, pathways, and a natural appearing ponds and water courses, even if created artificially. Plantings and buildings would be designed to fit into the flow of the Park and not for the primary purpose of being viewed for their individual beauty.
- League Island Park was intended to be functional providing a sense of community with different areas of the Park designed to support different activities (e.g. running, swimming, cycling, tennis, walking, and boating), while free of city sights and sounds.
- FDR Park's original purpose was to provide that respite, but the proposed 3.9 acres of the Park is no longer able to serve that purpose and functions primarily as over-flow parking for stadium events across South Broad Street. Original views having been spoiled with the vision of South Broad Street traffic and chain link fence on the East and the graffiti covered underbelly of I-95 looking South from within the Park.
- In recent decades due to competition for scarce municipal capital funding, FDR Park has suffered from neglect and has significantly deteriorated. The visually adverse effects of I-95 construction and its South Broad Street on-ramps have never been addressed from the perspective of the Park's original purpose.
- Roads have deteriorated and concrete paved and natural footpaths have become displaced or overgrown. The roads are no longer suitable for scheduled running and bicycling activities.
- The water's edge for the most part is no longer visible or accessible to park visitors.
- Although concrete paved Meadow Lake is now considered by some to be a natural lake and nesting area, its bottom contains several feet of sediment and its water quality is poor.
- The upper portion of Meadow Lake, adjacent to Pattison Avenue serves as a storm water catchment basin for the surrounding neighborhoods – essentially a sediment pond, which should be, but is not periodically cleaned to prevent sediment and other detritus from flowing into the downstream ponds and lakes in the Park.

- The boathouse, once an attraction and restaurant, has been essentially abandoned and its lower level boarded up.
- Some measures, though not sufficient have been taken to mitigate overwhelming summertime pond algae growth, and volunteer efforts led by the Friends of FDR have done their best to keep the Park clean.
- The Park (and particularly the 3.9 acre portion under consideration) is not a community hub in its fullest sense. Some people jog and walk their dogs, but to many there is a sense of foreboding with hidden places and unsavory activity in various parts of the Park and especially in the southern portion abutting I-95, its on-ramps and under bridges.
- The Project 250 plan will help restore the Park to suit its original purpose and uses. Visual barriers including Project 250's indoor facility and its surrounding landscape will help to restore the visual barrier to the east, as envisioned by Olmsted as a basis in all of his Park and campus design. Hedge and native plant covered berms will buffer the Park visitors view of the unsightly aspects of the I-95 ramps and Bridge and from the structures across South Broad Street in the Sports Complex.
- Numerous neighborhood associations and park-related organizations support Project 250, however, as was made clear at the hearing, apparently other adjacent or surrounding neighborhood associations should be familiarized with the Project. The Project 250 design team is willing to host further discussions to educate and receive input from all interested parties.

WHY FDR PARK, WHY NOT BROWNFIELD, AND WHY SO EXPENSIVE?

A. Why FDR?

- After extensive review and considerations of practicality, the 3.9 acre tract in FDR Park is ideally suitable for the mission of Project 250 for many reasons:
- Project 250's mission ideally suits the original purpose and of the Olmsted design and intended use of FDR Park by integrating a facility into the landscape with the intent to buffer the senses from the South Broad Street/I-95 intensity and draw users to the Park for many healthy and friendly purposes
- FDR Park is an ideal hub for indoor and outdoor running and cycling and swimming.
- Its loop roadway when repaired would be ideal for all kinds of training.
- It had been used in the past for amateur cycling and running races but is no longer practicable for that purpose.
- With an increase in water quality, the lakes could once again be used for competitive open water training and for water safety training.
- As Philadelphia competes with other U.S. and international cities in becoming a bicycle-friendly city, limited and controlled vehicular traffic in FDR Park provides a safe venue for young and old to learn bicycle handling skills.
- The meadows, lakes, wetlands, and waterways provide an ideal classroom/laboratory for young and old to learn about the complexity and biodiversity that is essential for sustainability and a healthy city.

- Natural resource and environmental programming will teach participants the life cycle of local flora and fauna and will help them develop planting and nourishing skills that can be applied to make the most of green spaces not just in the Park but also in home neighborhoods.

B. Brownfield Shortcomings

- Although the concept of recycling former industrial sites to new uses works in many contexts, particularly in a commercial or industrial development framework or in restoring waterfront properties to commercial or residential use, it simply does not work in this context, particularly due to the economics associated with location.
- Other properties, hidden within the urban boundary, would not generate adequate sponsorship interest due to locations. Sponsorship of Project 250 is critical to its success.
- 80 to 100 acres of brownfield, green or potential green space with lakes is not available.
- Potential environmental remediation dealing with former industrial sites increases development costs.
- Brownfield properties in old industrial or commercial areas within the City are not conducive to general public recreation and would be better used for future industrial development or transportation hub, especially so in areas of high unemployment.
- Brownfield remediation and development would require city, county, state financial assistance for the most basic facility.
- Brownfield sites in the City may not have the ease of transportation access nor the visibility required to support sponsorship.
- Very importantly, assuring safe access for the City's children and being in a portion of the City created for recreation and learning is a critical component of the Project.

C. Building Design Steps Towards Financial Viability

- **Option 1**. A relatively inexpensive open (outdoor concrete) velodrome would have limited fair-weather use and would be unoccupied during most of the winter months. It would not support much of Project 250's mission and would not generate adequate sponsorship interest. It would require City capital financing which is not currently adequate to return the Park to its original purpose. Further, it would not support the concept of restoring major portions of and facilities in FDR Park.
- **Option 2.** A smaller scale indoor facility with minimal seating surrounding the track would cost much more than an outdoor facility and it would not be adequate to support much of Project 250's mission. As has been seen with other USA attempts to build velodromes, a smaller facility will not generate adequate sponsorship interest. It would have a high risk of financial failure.
- **Option 3.** The least costly aesthetically pleasing facility would have seating capacity for 3 thousand spectators and outdoor parking. Although much more costly than Option 2, the spectator capacity isn't adequate to generate sufficient sponsorship interest. Up to 14 acres would be required for the building and adjacent minimum parking requirements. As with Options 1 and 2, there would be a high risk of financial failure

- **Option 4.** A unique park-integrated building design in this location, with an approximate 6 thousand seat spectator capacity including luxury seats and state of the art arena technology, a venue niche currently unavailable in Philadelphia has generated significant interest from Philadelphia based venue management companies. But, ticket sales and advertising alone would not be sufficient to assure financial viability.

  Option 4, although the most expensive of all, is preferred for many reasons including the fact that its location, proximity to the Sports Complex and I-95 makes it very attractive to sponsors. Sponsorship is critical to financing and operating the programs intended by Project 250. Yet, only 3.9 acres of the Park will be needed for the facility footprint.

VIEWSHEDS/AESTHETICS

- Parking and all other support services will be underground, secured and invisible to Park users and passers-by. Project 250's exterior design, visible from the Sports Complex and I-95 will be pleasing as an internationally recognizable symbol of Philadelphia. The exterior design visible from within the Park will seem quite different.
- The Project 250 facility and site improvements are being proposed to enhance the view sheds for Park users. Currently, if one were to look east from the center of the Park, South Broad Street traffic and the Wells Fargo Center and the other stadium complex buildings behind it present a very stark and overbearing presence beyond the Park. The Project 250 building profile would block the negative view shed towards South Broad Street while presenting a more compatible west facing facade with the use of natural materials (stone and vegetative buffers) to soften and blend the Park side façade into the Park landscape. In addition, over 300 new trees and accompanying shrubs will be creatively incorporated to increase the quality of the views from within the Park and to screen unwanted non-aesthetic urban and intensive automotive traffic views, mostly to the south and east. The Olmstead Brothers original vision was to create a natural oasis in contrast to the regimentation and the dense rectilinear fabric of the typical urban setting. Project 250's curvilinear design and sweeping natural appearing landscape forms are in keeping with and will enhance the original Olmstead vision.
- The building design and the venue niche it serves, once combined with Project 250's complete mission of community service and the restoration of the Park to its original purpose generates value synergy that is unique. The significant impact of this synergistic concept creates long term financial viability that is otherwise unachievable. Although events will be scheduled and tickets will be sold, the unique association of those events with the Project 250 concept, mission, and associated social benefits attracts sponsorship interest sufficient to amortize the capital cost of the entire mission.

NO NET LOSS OF OPEN LAND

- Project 250's facility footprint covers a mere 3.9 acres in a corner of the park surrounded by the constant urban commotion on South Broad Street and the I-95

interchange. The acreage will be replaced with acreage closer to residential areas on the site of the former Naval Hospital directly across Pattison Avenue from the FDR Park as an extension of the Park itself. It will be accessed via a signaled street crossing with a pedestrian "parkway."

- Redeveloping this former building site by the private sector project development team will expedite its return to a valuable use for the community in South Philadelphia at no expense to the City.
- Parkway and Park extension will be designed with input from the neighbors with Olmsted's vision to appear natural, providing an oasis of community activity free from the constraints of home living and back yards.
- The improved safe access to the waters' edge areas, improved site lines and view sheds, and Park security will in an immeasurable way restore the significant original open land to its original purpose while recognizing and considering the aquatic and terrestrial transition area for species habitat.

WHAT IS THE RISK OF FAILURE?

- Only upon City approval will the Project 250 team be able to enter into negotiations with sponsors for a definitive agreement(s) to guarantee annual cash flows sufficient to amortize the capital cost of the Project. Concurrently, final design and permitting will take place. Should we fail to generate sponsorship cash flows sufficient to complete the entire Project (i.e. facility and Park restoration concurrently), Project 250 will not begin any excavation for construction of the facility.
- If we complete construction of the facility and circumstances occur in future years determine that the facility is no longer financially viable, in order to protect the City from assuming a financial burden associated with demolition of the facility, Project 250 will provide an adequate financial assurance mechanism for demolishing the building and restoring the affected 3.9 acres to its original use as vacant park space.

ENVIRONMENTAL REGULATORY ISSUES

- Although many of the environmental, engineering and regulatory programs addressed at the public hearing are outside of the Commission's jurisdiction, the public should know that Project 250 planners have identified all of the regulatory requirements related to initial Project design and construction through day-to-day operations of the facility. Federal, state and local regulatory agencies with jurisdiction over issues such as stormwater control, air quality, water quality, highway interchanges, sewage system design and operation, occupancy approvals, wetlands and waterways, flood control, fish and wildlife protection and cultural/historic resources will review components of Project 250 to assure compliance with regulatory requirements. Obtaining proper permits, approval and licenses from these agencies is critical to project development and provides adequate assurances that regulatory standards are met and that important resources are protected.

- The development of the Project 250 facility will account for the 100 year floodplain with any structures or additional fill. The construction of the Project 250 facility within the floodplain is permitted by Code (*City of Philadelphia Zoning Code, §14-1606)* provided that the structure is flood-proofed to one foot above the Regulatory Flood Elevation at the time of approval. The planning to date and moving forward will be based on the current FEMA mapping as adopted by the City of Philadelphia which are the January 2007 Flood Insurance Rate Maps.
- Embankment fills or structures that extend into the 100 year floodplain will be offset by additional grading within the floodplain to remove fills including dredging of the lakes and waterways. A "no net-rise" Engineering Certification will be required in order to obtain agency approvals prior to construction.
- After Hurricane Sandy, FEMA produced new Flood Insurance Rate Maps to respond to the property damage in the region. The Preliminary Flood Insurance Rate Maps were issued in February 2014 and identify a base flood elevation of 11. The new FIRM maps have a significant physical and financial impact on existing properties as well as the development of new properties within the City. The City of Philadelphia has not adopted the new mapping and therefore the new maps are not required to be followed as they have not yet become part of the City Code and Charter.
- The Project 250 team will comply with regulations in place at the time of construction and will make every effort to include the new mapping requirements into the Project if they are not enacted upon during the Project.
- The Project 250 proposal includes the dredging of the artificial water bodies and restoration of the wetlands, lakes, and waterways within the park. If applicable to those waters, the Project will obtain applicable permits as required by the U.S. Army Corps of Engineers and the Pennsylvania Department of Environmental Protection. Dredging will include removal of sediments that have accumulated on the bottom of the concrete lined lakes and waterways over the past 138 years since the facility was opened. The plan includes removal of invasive plant species around the lake and planting of new wetlands plants that will aid in maintaining a healthy ecosystem for the transient, migratory, and permanent wildlife that occupies the park. Wildlife within the water including fishes will be maintained during the dredging with additional native species introduced to the lakes and waterways under the guidance of U.S. Fish and Wildlife and other aquatic biology experts.
- Littoral/riparian zones associated with water bodies will be repaired and improved where they have deteriorated, eroded or have become dangerous. The intent will be to restore the water bodies and riparian zones to a natural habitat that is close to that seen today.
- The Project 250 proposal includes the repair and repaving of trails, parking lots and the roadway within the park. Improvements to the roadway will include repairing drainage inlets and grates, repairing potholes, and resurfacing the roadway. Improvements to the trails will include repair and restoration of existing trails and includes the removal of roots that have heaved trails, regrading of areas around trails to improve drainage, and

repair of deteriorated trails to last far into the future. The existing parking lots that have deteriorated and require improvement will be repaired and/or reconstructed.

- This Project will utilize green stormwater infrastructure, where possible, such as pervious pavements and improved grading and infiltration to reduce the impervious areas within the park and improve the overall health of the waterways and ecosystems within the park.

IMPACTS TO THREATENED OR ENDANGERED SPECIES

- As part of the environmental permitting process, the development of the Project 250 facility will involve an environmental assessment that will include wildlife biologist investigation of the habitat including threatened and endangered species. Identification of specific flora and fauna nesting locations will be documented and mitigation plans developed. Construction will be limited where necessary to occur outside migratory, mating, or nesting seasons of the species identified. The Project team would be pleased to receive information and expertise from local ornithological and horticultural experts familiar with the Delaware River Basin ecosystems and FDR Park.

IMPACTS TO STORMWATER AND LOCAL FLOODING

- Consistent with federal, state and local standards, the development of the Project 250 facility will include numerous stormwater management features and will include green hydrological infrastructure such as pervious pavements, green roofs, and stormwater reclamation and reuse. Additionally, the dredging and removal of silts from the lakes and waterways will improve drainage within the park and re-create capacity for storm water retention and local flood control.

PARKING

- There are 142 spaces identified within the underground parking garage to the south of the facility. The parking area will be covered by green, vegetative landscape and will be essentially invisible as a parking area. This parking will accommodate the base uses of the facility as a recreation center and for ongoing training and use by the community. For larger events, parking overflow will need to be accommodated within the parking lots of the Wells Fargo Center, east of Broad Street, or the parking lot north of Pattison Avenue near the location of the proposed park. With capacities for some events in excess of 6,000 persons and typical per vehicle capacities between 1.5 and 2.0 depending upon the event, additional parking of approximately 3,000 to 4,500 is required.
- Coordination with the event schedulers and operators of the parking lot are necessary to provide the parking for events at the facility. Project 250 will coordinate the scheduling of events with the Wells Fargo Complex, the Citizens Bank Park Complex, and Lincoln Financial Field Complex to minimize impacts to traffic during multiple events.

TRAFFIC

- A new entrance and exit into the park will be constructed at the location of the existing exit from the Wells Fargo Center parking lot south of the Zinkoff Blvd entrance. The portion of the internal roadway from the Southeast Entrance into the Park near the two former bathhouse buildings north to the main entrance will be redesigned as a two way roadway. Parking will be restored along this roadway upon its relocation. The new entrance and exit off Broad Street into the park in accord with PennDOT standards and approvals will permit access into and out of the facility without further impact to the intersection of Broad Street and Pattison Avenue. The additional traffic generated by the Project 250 facility will not impact existing traffic significantly and the improvements to the new intersection coupled with improvements to traffic light timing of the intersection at Broad Street and Pattison Avenue will aid in improving traffic after events at the Sports Complex.
- Pedestrian crossings at the new intersection will be improved for access between the facility and the Wells Fargo parking lot and AT&T Broad Street Subway Station.

Project 250 appreciates your audience and feedback, and will be happy to answer any additional questions or provide further clarifications.

Very truly yours,

Philip J Senechal
CEO
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APPENDIX

EXISTING VIEWSHED PHOTOS

VIEW FROM SITE TO SE CORNER FDR PARK

VIEW FROM FDR PARK EAST TO SITE AND WF CENTER

VIEW AT GRADE S.E. CORNER FDR PARK

VIEW TO S.E. FROM MAINTENANCE BLDG. FDR PARK

VIEW TO SOUTH FROM FDR PARK BALL FIELDS

VIEW TO EAST ON SOUTH FDR PARK PERIMETER

VIEW S. UNDER I-95 BRIDGE FROM FDR PARK LOOP ROAD