



Lower North District Plan Public Feedback

THRIVE

- **From the Public Meeting**

- Incorporate the community into neighborhoods.
- I am pro Germantown and Lehigh recommendations, but what about the other commercial corridors?
- I am pro the recommendations for preserving concentrations of homeownership, but this may price people out of the community.
- I like the recommendations to install priority signals at the district's fire stations.
- Be aware of the economics in the neighborhoods: if you downzone to single family, people who want to convert their homes to apartments, and aren't able to, may not be able to stay in their homes.

- **From e-mails**

- I reviewed the draft of the Lower North Philadelphia Plan and I would like to see a note on the need to revitalize the Germantown corridor between Berks and York as well as continued efforts are needed to bring back Germantown Avenue from York to Lehigh Avenue. There has been recent investment by the Commerce Dept , Mural Arts program and the Village of Arts and Humanities.

I would also like to see a connection along the Berks street corridor that extends to 9th Street and incorporates the Paseo Verde project and the proposed Senior Housing Project that was a result of the charette.

- The Land Bank studies were created by Project H.O.M.E and Habitat for Humanity with Funding from the Oak Foundation. Not one of our community organizations was given funding to plan or study. We want access to land, our assets, to create equity in development projects. As gentrification is moving northward we are limited by poverty stats.
- PHA is a major part of most of the public developments in the 5th District. We want to meet with PHA board and managers ASAP.
- Before any public schools are to be sold or reused, we want input before decisions are made.
- African American millennia are not being encouraged to repopulate North Philly the way young Whites are being encouraged to repopulate Port Richmond, Fishtown and Northern Liberties. If African American professionals were encouraged and given

incentive, they too would be moving to the urban setting and adding their creativity. All of those developments are supposed to create jobs and economic development. We want inclusion of area businesses and employees. We want to eliminate grey zones and disinvestment in the 5th District.

- On December 3, 2013 at 3000 W. Master Street, the Philadelphia Commission on Human Relations convened a “Changing Neighborhoods” listening session. We are requesting the same listening session to be held where Temple student housing is saturating North Central closer to Broad Street and environs.

CONNECT

- **From the Public Meeting**
 - We need better bike access to Temple University
 - Use 13th Street as a two-way bike lane from Spring Garden
 - Refer to the "Think" bike charette with MOTU from two years ago
 - 1,800 bike parking spaces at Temple U.- trying to double it
 - There is no good way to bike to Temple's medical campus
 - Need to improve 12th Street (which will get you there)
 - Germantown Avenue is important as a corridor and should be developed commercial
 - Create a shared use path on 33rd Street (next to Fairmount Park)
- **From the January 28th City Planning Commission Meeting**
 - Residential development was recently approved for 31st Street and Glenwood Avenue. Consider a recommendation for a regional rail station in this area.
- **From e-mails**
 - Page 58, Recommendation 21: consider adding, as a connection for improvement, the "T" intersection of Polar Street and Poplar Drive, reduction of the intersection size for the purpose of pedestrian safety. This crossing adjoins Fairmount Park, and has several recreation facilities nearby.

RENEW

- **From the Public Meeting**
 - Add the Blue Horizon to the local historic register as well

- Is the City aware of decreasing Philadelphia-registered voters as more students move into the Temple University neighborhood?
 - The 1600 block of W. Girard Avenue should be locally designated too.
 - Good recommendations: I like the ones for historic designation
 - How can we make Norris Square like Clark Park? That should be a goal.
 - The Mansion District is a great asset
 - How does the LNO plan engage the East Fairmount Park edge? (Public access)
 - 33rd Street is more permeable than Parkside (more frequent crossings)
 - Recommendation #3: Add "Bring state of good repair to Athletic Recreation Center (asbestos removal, mold removal, heat, field maintenance)
- **From e-mails**
 - I have attended some of these meetings and continue with the community to be interested in this plan. We would love to see our courtyards, islands and other places revitalized and improved.
 - The Audubon Society/Outward Bound has plans for the conservation center at 33rd and Oxford. We want input for all of our youth. There are several major changes planned for Fairmount Park, per Penn Praxis focusing on Kelly Drive access. We do not want the neighborhood to lose any access or focus.
 - The Philadelphia Water Department has major changes planned for the reservoir at 33rd and Diamond Street. Please do not change the reservoir to orient the focus toward 33rd and Oxford Street. Leave the Belgian block intact. We need a real community meeting ASAP.
 - Focus on an upgrade to Mander Recreation Center, named after an African American, Joseph Mander.

Zoning and Land Use

- **From the Public Meeting**
 - I'm curious why there's not more commercial zoning along Lehigh Avenue
 - Get corner stores up to Code (along Lehigh Avenue).
 - Encourage corner stores to have more variety of product
 - You're doing a great job, just leave my properties alone
 - American Street and Germantown Avenue should be converted to commercial
 - Upzoning at #5 and downzoning at #4 work

- #4 refers to the northern part of Strawberry Mansion where staff proposes changing multi-family zoning to single family.
 - #5 refers to a small strip of large houses on 33rd Street facing Fairmount Park where staff believes that upzoning, to multi-family, will help property owners to generate enough income to repair their buildings.
 - #2: I disagree with the proposed RM1. This should reinforce commercial instead (Girard to Cecil B Moore Avenue)
 - This refers to downzoning Ridge in the Focus Area
- **From the January 28th City Planning Commission Meeting**
 - I doubt that the demand for multi-family housing is as low as you've stated. I also believe that your current population and projections are understated. There are significant undercounted populations in this district.
 - The vacant land on American Street should be allowed to transition away from industrial zoning and toward a mixed of artisanal industry and residential.
- **From e-mails**
 - Zoning changes may have to be made regarding rooming houses if single family homeowners' taxes are affected. We want all capital projects focused on in the next and upcoming budgets. We want our dreams to be realized just like the folks from outside of our community who are plotting and planning like we do not matter.

Focus Areas/ Focus Topic

Vacancy Focus Topic

- **From the Public Meeting**
 - The plan seems to benefit community as a whole
 - Sharswood needs market-rate development to build up neighborhood wealth
 - City development policy is slanted towards large developers (CDCs, not small individual ones)
 - It makes sense to fill in blocks that are largely occupied
 - I'm happy to see change as long as the community is involved / represented
 - Employment opportunities from buildings and in new housing (e.g. training for kids on construction sites)
 - I want to see education for existing residents on their options

- Assistance with clearing title for grandfathered owners
- The area around the Village of Arts and Humanities also has a high number of vacancies
- No boarding houses for drug addicts!
- Unwillingness of the City to convey publicly-owned individual lots hampers development

Ridge Avenue Focus Area

- **From the Public Meeting**

- Good idea to right-size Ridge Avenue
- Yes to 23rd Street re-introduction
- Attention (beautification) to Ridge is definitely needed to improve Sharswood
- Agree with rear parking on small blocks
- Don't tread on me
- Don't take away commercial zoning near the proposed larger retail on Ridge Avenue

American Street Focus Area

- **From the Public Meeting**

- There is too much emphasis on beautifying vacant land, not enough on development
- Finite period for developer to hold vacant land if it came from the City
 - If no development, then land is returned to the City
- Give more vacant land to community groups
- I'd like to see more affordable housing around 5th Street
 - Broaden the definition of affordable
 - Include the blocks near American Street
 - Two other people liked this comment
- I'd rather see single family around 5th Street
 - Single family housing is good for kids' safety
- Business development should support jobs
- Industrial development won't happen on American Street
- A dog park (dog park trust model) is needed: It's a public health issue - no joke!
- Industrial buildings need to be friendlier in terms of appearance (not like the new Veyko building)
- The American Street corridor still divides us
- I'd like to see a mixed use corridor (not the current Veyko building)

- 2nd Street and 5th Street are not ideal for bike lanes - American Street is better
- Explore bike lane against curb lines
- Neighborhood conservation overlay desired for American Street
 - Bring buildings closer to the street
 - No "prison" architecture on American Street
 - Four other people liked this comment
- Why not push proposed ICMX zoning up to Cecil B Moore Avenue?
 - Either side is dense between Master and Cecil B Moore
- Why not put new commercial on American Street north of Master Street? Isn't it all vacant now anyway?

Crawford Development Group

1301 N. 2nd Street
Philadelphia, PA 19122
(267) 546-0009
peter@crawfordgroup.org

February 13, 2014

Via electronic mail and regular mail

David Fecteau, AICP

City Planner, Planning Division
Philadelphia City Planning Commission
One Parkway Building
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Re: Lower North District Plan

Dear David:

This letter sets forth my comments to the Draft Lower North District Plan.

By way of background, Crawford Development Group and its related entities are owners and developers of real estate, with over 90% of its holdings concentrated in the Lower North District between Front Street and 18th Street. Our principal office is also located in the Lower North District at 1301 North 2nd Street.

I. Transportation: Streets

A. General comment: In general, circulation through the District is poor. There is a notable lack of wide arterial streets, especially east-west; and there are numerous travel obstructions, including the Reading Viaduct, the Amtrak Northeast Corridor line, and Temple University. Some obstructions are of recent vintage such as Borinquen Plaza, the 4th & Dauphin Park and the Honor Foods facility.

B. Recommendation: Oxford/Jefferson Streets. West of 6th Street, Oxford Street is one way westbound to 33rd (except for a short two way portion between 13th & Broad); from 6th to Germantown, Oxford is two ways; then east of Germantown, it becomes one way eastbound. To improve circulation, make Oxford one way westbound from Front to 33rd.

Jefferson is one way eastbound from 32nd to 2nd; it then becomes one way westbound between 2nd and Front, thus creating an intersection with two mirrored "Do

not enter signs.” To improve circulation, make Jefferson one way eastbound from 32nd to Front.

Observation: At present, there are no westbound through streets east of Broad between Master and Norris. Changing Oxford to westbound would rectify this.

C. Recommendation: 7th and 8th Streets: Both these streets change direction as they cross Germantown Avenue. 7th is northbound south of Germantown; 8th is southbound south of Germantown. This change in direction interferes with a bus line that runs on both streets. To improve circulation, make 8th Street southbound all the way from Lehigh to Girard and 7th Street northbound from Girard to Lehigh. This is consistent with the Planning Commission’s recommendation to allow southbound traffic on 8th St. between Thompson and Girard.

D. Traffic signals on Cecil B. Moore Avenue. Cecil B. Moore Avenue has a traffic signal at 8th Street, which is a lightly traveled intersection, but just a stop sign at 6th Street, which is more heavily traveled. It should be the reverse. 6th Street is a major southbound artery.

E. Recommendation: Berks Street. Berks Street is a wide two way street between 6th and Front. West of 6th, it is one way westbound. While there is some cost associated with the change, it would be beneficial to make Berks a two way street all the way from 11th to Front. This would allow the 3 Bus to directly connect the Temple University Regional Rail stop and the Berks stop on the Market Frankford Line. It would also create a very attractive eastern approach to Temple University, with the Bell Tower directly in one’s line of sight. There is enough vacant land and setbacks between 6th and 11th to allow some widening of the Berks St. cartway.

F. Recommendation: Restore Dauphin Street right of way through 4th & Dauphin park. This park is a major obstruction to transportation. Among other things, it causes a major detour to the 39 bus.

G. Recommendation: Germantown Avenue. I support the recommendation to make Germantown Avenue a two way thoroughfare below Berks Street. As a long term proposition, it would be beneficial to find a way to restore the continuity of Germantown between Berks and Norris, perhaps by detouring Germantown onto 5th and then inserting a diagonal cutover from 5th to the original cartway of Germantown between Norris and Diamond, where there is plenty of vacant land.

H. Long term Recommendation: There are no north-south through streets between Broad and 29th. This hurts the economy of the District. I have no suggested solution.

I. Long term recommendation: Sedgley and Glenwood Avenues. These avenues could be important thoroughfares if only they were continuous from

Broad to Girard. Another case where poor transportation arrangements depress economic activity. If they were continuous, they would attract traffic and that would attract commercial activity.

2. Parks/Open Space.

A. While the Lower North District has a number of city recreation centers, it has very few passive parks. The Temple University area in particular lacks any sort of passive park. The construction of Ingersoll Commons will bring a passive park to 16th & Master. This is a step in the right direction. However, it is quite far south and the area could benefit from parkland further north. The abandoned tennis courts at the corner of 16th & Susquehanna could be converted to parkland, while leaving the basketball courts in place near 15th Street. If the 22nd District abandons its current facility, that acreage could become parkland. Likewise, there is no parkland immediately east of Temple. The lot at 8th & Berks presents an opportunity to create a passive park.

If the city truly wishes to promote homeownership in Lower North, it should provide the services and amenities that attract homeowners.

B. There is a city-wide problem with scarce open space being taken for lightly used baseball diamonds. The Hancock Recreation Center and the Cruz Recreation Center are prominent examples. Baseball should be consolidated at a few regional locations and that land should be given back to the community as passive parkland for day to day use.

3. Zoning changes.

A. The draft Lower North Plan proposes to downzone large swathes of RM-1 land to RSA-5. Several blocks included in this downzoning are established multi-family blocks and I strenuously object to their conversion to single-family. In particular, the following blocks should remain multi-family: 1800 block of Bouvier (both sides); 1800 and 1900 blocks of North 18th St. (both sides); and 1900 block of Gratz (both sides). In researching the ownership records for these blocks, we have found that all four blocks are more than 60% investor owned. On the 1900 block of Gratz, for example, we identified 34 properties owned by multi-family investors and 5 possibly owned by owner occupants (if they are not vacant).

It should also be noted that the Cecil B. Moore Homeownership Zone ends at Montgomery Ave. None of the blocks mentioned above are part of the Homeownership Zone.

B. Transit Hubs. I support the creation of a Transit Oriented Development overlay for the Temple University Regional Rail Station and any and all stops on the Broad Street line and Market Frankford Line. The Susquehanna/Dauphin

Stop on the Broad Street line appears to be excluded from your proposed list of overlays and I would argue for its inclusion.

C. Downzoning commercial areas. There are relatively few active commercial uses noted in the existing land use map on page 17 of the Lower North Plan, compared to the number of lots zoned commercial. This should have been a wake up call that the District has too much commercial zoning. Yet, I do not see any effort on the Proposed Zoning map to downzone excess commercial parcels. To take one example, the north side of the 1500 block of Thompson is zoned all commercial, yet there is exactly one commercial establishment on the block.

D. Lower Germantown Avenue/Cadwallader Street. The 1200 block of Germantown Avenue is the site of a large proposed residential development called Liberty Square. This block will gain some coherence once the project is built. The 1300 and 1400 blocks are major problems. The 1300 block is desolate with only a few buildings standing: The Emil's facility; an auto repair shop; 310 W. Master which is being renovated for a coffee roaster; and a few residences that front on Thompson. Vince, the owner of Emil's, is reported to be a force in stymying development on the block. The 1400 block is dominated by vacant land, vacant buildings, and a couple of dilapidated low-intensity industrial buildings.

These blocks pose the same quandary as Lower American Street. On the one hand, there is the desire to preserve existing industry and provide room for other industrial users. On the other hand, there are the costs. The desolation and danger that springs from vacant land and poorly maintained and poorly lighted buildings. The lost tax dollars and economic activity from keeping parcels empty that could otherwise be put to residential or commercial use.

On the 1400 block of Cadwallader, I recently completed a multi-family apartment building and zoning is either approved or pending for three other residential structures. Nevertheless, the desolation of the area has made the building attractive to vandals and metal scavengers and has deterred some potential tenants.

Although there are active industrial users (maybe three) on the 1400 block of Germantown, they have not invested in their buildings. Trees are growing out of the buildings; roof areas are open; windows are smashed, etc. The lack of investment suggests that the current users do not see a future in their buildings. In this environment, I would like to see the Lower North Plan liberalize the zoning of the vacant parcels on the 1400 blocks of Germantown and Cadwallader. The future of these parcels is not going to be in industry, but could involve a mixture of commercial and residential uses.

E. Front Street. The Plan pays little attention to Front Street despite its being the spine of a major transit line. Due to the noise and unsightliness of the El, Front Street is one of the most blighted major streets in the Lower North District. In recognition of the difficulty in developing land on Front Street, I would like to see a

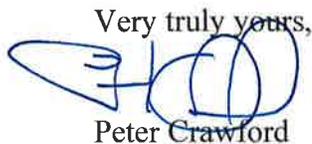
relaxation of zoning and dimensional standards. The 38 foot height limit of CMX-2 does not work when 38 feet puts one at eye level with an El train. The height limit needs to be liberalize to allow buildings to tower a bit above the El.

F. American Street. The comments about Lower Germantown/Lower Cadwallader Street are equally applicable to American Street. American Street is perhaps best viewed as North Philadelphia's equivalent of Washington Avenue West. Like American Street, Washington Avenue West is the site of a former rail line, is dominated by low-rise industrial uses, and is close to residential areas on both sides. Yet there are differences too. American Street lacks the easy transportation connections of Washington Avenue; and American Street is far more blighted with vacant land.

The Planning Commission should obviously look at the poor transportation connections to American Street. To begin with, it is a stub street, not a through street. If there is a way it can be made into a through street, perhaps by extending its northern terminus, perhaps to Allegheny Avenue, that would be desirable. The southern terminus could be solved by appropriating part of the Soko Lofts property and feeding American into 2nd Street.

Washington Avenue West enjoys more zoning flexibility than American Street, yet it is not dominated by residences. Rather, it is becoming home to more commercial uses, such as shopping centers. The same could be considered for American Street, but only if the transportation issues are solved.

The poor condition of the cartway and sidewalks on American Street must also be noted. The City has succeeded in attracting a huge amount of investment to the Navy Yard, in part due to the enormous investments in street and sidewalk infrastructure. If the City is serious about attracting industry to American Street, it should consider similar investments.

Very truly yours,

Peter Crawford

From: Maria Sourbeer

To: David Fecteau

Subject: Re: Lower North District Plan Adoption Postponed until April 15th Planning Commission Meeting

Date: Wednesday, February 26, 2014 11:52:35 AM

That extension news is great, thank you! Some comments from NSCA on the draft plan:

1. The perimeter of the American Street focus area changes in each section. NSCA would like to see the boundaries that are shown on page 27 used throughout the plan.
2. At our last Steering Committee meeting we heard that there is push-back from PIDC and Commerce with regard to proposing a new zoning category on American. We have gotten repeated feedback from our community that commercial is desired on American. The information you provided confirms that area residents travel to either Allegheny or South Philly for a lot of their shopping. Please make note that our recommendation is for commercial mixed use all along American. By not addressing a change here, we are keeping the area blighted.
3. Multi-family residential is another use for American that has been expressed repeatedly by residents here.
4. N 2nd is a highly travelled strip with trucks and cars moving at higher speeds than they should. Double parking is a problem so often it's narrowed to one lane. The businesses along N 2nd often have their trucks and cars double parked. A bike lane here could be very dangerous.
5. We are very interested in hearing more about the proposed transit hub at York/Dauphin. We'd need more information to further discuss this idea.

From: gleeson729@comcast.net
To: [David Fecteau](#)
Subject: Comment on Lower North Plan
Date: Sunday, February 23, 2014 1:20:42 PM

David Gleeson
Crane Arts LLC
1400 N. American St.
Philadelphia, PA 19122

Mr. David Fecteau
Planning Commission
City of Philadelphia

RE: Comment about Lower North Draft Plan

February 23, 2014

Dear David:

The draft plan for rezoning the Lower North section of Philadelphia lacks a useful vision for the North American Street Corridor which has floundered since the 1970s. North American Street is a once majestic corridor that stands essentially undeveloped and desolate. With an even slightly more inspired zoning vision, North American St. could be a wonderful community-connector between Girard Avenue and Lehigh Avenue. Instead, all of us who live near and work on N. American St. are stuck with the same outdated and uninspired industrial zoning policies that have stifled our community's rejuvenation for nearly 20 years.

The problem and its solution are simple. The strictly industrial zoning along N. American St. must simply evolve to also allow mixed uses that include and encourage commercial and residential uses. This change to a more enlightened vision for community development, industrial development and business development should extend the entire length of N. American St. from Girard Ave. to Lehigh Ave.

For several reasons, industrial investment on N. American St. has always fallen far short.

First, the size of the land parcels on N. American St. are barely 100 feet deep and are completely inappropriate for the industrial uses that are mandated under the existing zoning for the Corridor. Tragically, the big and beautiful multi-story buildings that once lined N. American St. were torn down in an effort to "assemble industrial land parcels." But, big industry has not come, and will never come to N. American St. And, the big beautiful buildings are now gone.

Second, the creation of convenient and non-disruptive access for trucks onto the N. American St. Corridor is virtually impossible.

Third, the small-scale creative manufacturers that are the best hope for reindustrialization along N. American St. still find it to be a desolate corridor without the sort of creative energy that a mixed use vision would create. A comprehensive vision that would also encourage small-scale creative producers can and must include the allowance of commercial and residential land use on N. American St. The disallowance of commercial and residential uses on the narrow parcels along N. American St. is counterproductive to the development of the residential and business communities along the Corridor.

Nearly 5 years ago, a comprehensive land-use study by the Philadelphia Industrial Development Corporation (PIDC) advocated for a new, mixed-use vision for much of the North American St. Corridor. PIDC suggested that between Berks Street and Girard Avenue the zoning for North American Street should evolve to allow for more diversified land uses than simply industrial. This was an enlightened and informed view of land-use in Philadelphia and it is one that should be extended to cover the entire North American Street Corridor. At a bare minimum, the Lower North plan should honor PIDC's call for a better mixed-use vision for North American St. south of Berks. The community-building and jobs-building energy spurt that mixed-use zoning will bring to N. American St. should become an integral part of the new zoning plan for the Lower North section of Philadelphia.

The fatal flaw in the current draft plan for N. American St. above Master Street is the belief that commercial real estate investment will flow into projects that are not allowed to contain residential uses on their upper floors. Without a mixed-use residential component, the belief that commercial investment will flow into American St. is as flawed as the 20-year hope of cramming industrial users into those tiny parcels. It just won't happen. And, the sort of commercial developers that might speculate on building on American Street will inevitably just create the sort of cut-rate strip center buildings that inevitably ruin the fabric of a neighborhood. The current proposal for American St. north of Master St. is just another deeply flawed half-step into the same direction that has hurt American St. and the adjacent neighbors for the past 20 years.

Many visionaries for a better Philadelphia are often criticized as being envious of other cities such as Berlin, Amsterdam, New York or Seattle. However, I and many of those from Philadelphia and the world-over whom I have shown around our neighborhood don't envy other cities. We envy Philadelphia. We envy all the great potential that we have right here in our back yard. We envy the opportunity for a better mixed-use vision for American St. that connects the Latino vitality of N. 5th Street's Calle de Oro with the young energy flowing into Girard Avenue. We envy the ability to use a better American St. vision to connect the Al Aqsa Mosque's community development efforts with the similar family-oriented vision around Norris Square. We envy the ability for Philadelphia and PIDC to

attract and keep industry here by helping them to locate on Philadelphia's many other industrial-appropriate sites. We envy the ability for mixed-use zoning to help the long time cabinet maker on N. American St. to survive by renting his second floor as a live-work space for other productive people who want to locate on N. American St.

It is time for a new vision for North American Street. It should allow industrial, commercial and residential uses along the Corridor. Only then will our neighborhood be able to embrace its potential. Otherwise we will squander this special moment in time when significant mixed use investment is clamoring to come to American St. Please do not blow this opportunity.

Sincerely,

David Gleeson

From: [Nathan Fried](#)
To: [David Fecteau](#)
Subject: Lower North Master Plan on American
Date: Friday, February 28, 2014 1:50:17 PM

Hi there,

A recent article by Hidden City featured this corridor and it said that you guys were still taking public comment. I thought I would throw in a comment about American street if possible. I live on Stiles and American, so it definitely affects my future. Sorry for the late comment.

Anywho... I see that you are planning to rezone everything south of Master as residential/commercial on American. Then Master to jefferson would be mixed industrial and commercial. Then above that would be industrial.

Don't you think that this rezoning is a little too far south? If you look at the map and consider the potential for the Crane Arts building to have residential, consider the new low income islamic housing coming in just to the west of this, and then all of the residential developments pushing as far north as cecil b. moore... would it not be smarter to extend the residential/commercial overlay all the way to at least Oxford? The parcel at oxford and american is becoming an industrial space, but nothing south of that will ever become industrial... nor should it.

So in short, my comment is simply that you guys should consider having the mixed residential/commercial extend just two blocks north of what you are now considering.

That is all... don't cut residential development off on american street at such a southern street. let it be rezoned up to Oxford where the new industrial complex is going. This will help create a better buffering for the inevitable future development of residential neighborhoods.

Thanks!

~Nate

--

Nathan Fried, PhD Candidate
Thomas Jefferson University
[Farber Institute for Neurosciences](#)
Nathan.Fried@Jefferson.edu
609.505.0799

Crawford Development Group

1301 N. 2nd Street
Philadelphia, PA 19122
(267) 546-0009
peter@crawfordgroup.org

March 27, 2014

Via electronic mail and regular mail

David Fecteau, AICP

City Planner, Planning Division
Philadelphia City Planning Commission
One Parkway Building
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Re: Lower North District Plan

Dear David:

This letter supplements my letter of February 13, 2014 and sets forth additional comments to the Draft Lower North District Plan.

I. Transportation: Streets

A. Thompson Street: Thompson Street has a stop sign at the corner of Marshall Street. There is not enough traffic at Marshall to justify a stop sign.

Thompson Street lacks a stop sign at Howard Street. Howard is a significant northbound street. Master has a stop sign at Howard, as do Jefferson and Oxford. A stop sign should be added here.

B. 9th Street: 9th Street, like 8th and 7th, changes direction when it crosses Germantown Avenue. Traffic circulation would be better served if it maintained its northbound direction from Girard to Lehigh.

II. Zoning changes.

A. The draft Lower North Plan (as amended through March 2014) proposes to downzone large swathes of RM-1 and CMX-2 land to RSA-5. The Planning Commission should examine the physical structure of individual blocks before including those blocks in its proposed downzoning. For example:

1. The 1500 block of W. Thompson St., north side, still has two commercial uses (a beauty shop and garage) and a number of multi-family buildings. It should be zoned RM-1.

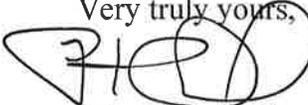
2. The 1900 block of 7th Street is composed of wide and deep lots with widths between 17 and 23 feet and depths of up to 100 feet. Most if not all the buildings on the block are apartment buildings, including 5 new triplexes that were developed in 2013. It would be foolish to rezone this block to single family use.

3. It appears the 1500 block of 16th Street is being zoned single-family even though it is famous, historic block of 5,000+ square foot mansions which are too large to re-use as single-family dwellings.

4. The 1500 block of 17th Street is an historic street with very large structures on 23 foot wide lots, all of which to my knowledge are now used as apartment buildings. It should remain multi-family.

5. Many streets in southern Strawberry Mansion have 3 story Victorian mansions which are more appropriate to be re-used as multi-family dwellings. Those streets should be rezoned multi-family. It should be noted that multi-family uses are not incompatible with owner occupancy. University City has many multi-family dwellings that are owner occupied with accessory apartments that help the owner pay the mortgage.

B. Overzoning of commercial uses: It appears that the 600 to 800 blocks of Master, Jefferson and Oxford continue to have CMX-2 zoning on the latest map. These are not viable commercial areas. There are a few corner stores which are still operating, but other than that, these blocks consist of vacant land and residential infill. I recommend that these blocks be downzoned to residential with the exception of any functioning corner stores.

Very truly yours,

Peter Crawford

From: Leah Murphy [leah@interface-studio.com]
Sent: Monday, March 31, 2014 5:06 PM
To: David Fecteau; Jack Conviser
Cc: 'Lisa Maiello'; Marilyn Cruz; Shanta Schachter; 'Adli zalloum'; Ariel Vazquez; J Noon; jessica.k.brooks@gmail.com; Nicole Lagreca; coreyibell@gmail.com
Subject: SKCP Lower North input

Hi Dave and Jack,

At long last, please find attached a statement from South Kensington Community Partners that has been vetted and reviewed by the Board, Planning and Zoning Committee, and NAC Committee. This statement is primarily focused on the industrial issues and land use adjacency conflicts—please keep an eye out for forthcoming input from Lisa regarding a range of additional topics. The Council President's office has also requested our input, and we will be sharing our perspective with other stakeholders and agencies as well. Thank you for your patience and I look forward to discussing these topics further. Best,

LEAH MURPHY

Senior Associate Urban Designer and Planner

INTERFACE STUDIO LLC
www.interface-studio.com
tel. 215.925.5595

INTRODUCTION

South Kensington Community Partners, on behalf of the South Kensington community bounded by Front, 6th, and Berks Streets and Girard Avenue [also known as Old Kensington], feels the need to voice concerns regarding a number of issues related to the Lower North 2035 District Plan process, as the rezoning of properties in this area will have a formative influence on the direction of development—or lack thereof—in the coming years.

The high level of vacancy among formerly industrial properties in South Kensington creates considerable public realm and quality of life impacts on the neighborhood and its residents. Some of these conditions are further exacerbated by the fact that the majority of active industrial uses have not participated along with families and businesses in community-wide efforts to improve the neighborhood, as well as by the fact that most industrial businesses have not demonstrated sensitivity to their neighborhood context and the many ways in which their operations create problems for the community.

These issues persist generally in the neighborhood wherever zoning and land use conflicts are found, but they are particularly pronounced along the American Street Corridor. Those of us who work and reside in the neighborhood and those of us who are investing our time, energy and resources into the life of the neighborhood, consider American Street to be a part of—in fact a central corridor and opportunity within—the neighborhood, not as a boundary between neighborhoods. Our community traverses American Street despite the rift it creates in our neighborhood fabric: it is crossed by school catchments, family relationships, crossed and traveled everyday by residents, workers, and those whose place of worship requires them to do so.

The land use policies that have been in place for over 50 years—pumping public resources into and engineering public interventions toward the recruitment and relocation of traditional industrial users to American Street, many of whom have since moved on without any public benefit to justify the subsidies they received—have failed to deliver the vision of a thriving industrial corridor, and they have failed to acknowledge or respect the community's needs. It is time for a new model that unites the two halves of a revitalizing neighborhood while also accomplishing job growth and economic impact—an achievable vision for American Street that embraces the a more modern form of industrial productivity that can coexist with a wider range of uses and harmonize with adjacent neighborhood streets. The vision outlined in this statement is embraced by South Kensington community members, including some of American

Street's business owners themselves. It is not our intent to suggest any relocation of existing industrial businesses—we would simply like to see things evolve in a different direction that allows for some acceptable compromise between the agendas of external forces and the residents who are forced to live with the consequences of them.

We feel this planning process is a critical and long-awaited opportunity to put in place land use policies promoting continued neighborhood revitalization and reinvestment in South Kensington that will strengthen our neighborhood. However, the plan recommendations we have seen so far from the Planning Commission have fallen well short of our expectations and we are very concerned that these decisions will serve to further fragment our neighborhood and impose serious quality of life issues on our community. Long-time residents have been waiting for decades for our neighborhood's fallow industrial lots to be rezoned to allow for other uses and many new residents have come to the neighborhood with the same anticipation. Our hope is that this process will bring an end to one-sided land use policies that favor external influences and agendas at the cost of neighborhood health, safety, and vitality. We expect to see some revisions made to the draft planning document and urge the Planning Commission to consider the following position:

- 1. High vacancy rate and existing industrial users in the greater American Street area impose considerable negative impacts on adjacent neighborhood fabric.**
- 2. The persistent high vacancy rate is a strong indicator of the corridor's failure as an industrial district.**
- 3. Current zoning is holding back new development that would enhance neighborhood resiliency.**

BACKGROUND

- 1. High vacancy rate and existing industrial users in the greater American Street area impose considerable negative impacts on adjacent neighborhood fabric.**

American Street, as a distinct concentration of vacant land and industrial users not compatible with adjacent neighborhood fabric, attempts to divide our neighborhood in half with a vast corridor of desolation, neglect, and ambivalence to the strengthening community around it. More than ambivalent, it is a significant obstacle to neighborhood reinvestment and resilience. Zoning as a concept exists partially to avoid incompatible land use adjacencies, and it is difficult for our community to understand why this purpose isn't being carried through. Instead, land use policies allowing manufacturers and warehouse distribution centers to locate next to homes are being proposed. The negative impacts are felt in a number of ways:

> The appearance and desolation of South Kensington's areas zoned for industry—particularly on American Street—do not encourage investment in adjacent neighborhood areas. Prevalent vacancy, lack of property maintenance, and poor condition of public infrastructure are major constraints to the otherwise steadily strengthening neighborhood. Beyond their existence as eyesores, existing industrial users and vacant formerly industrial properties have serious implications for real estate values and desirability for properties nearby. The negative effects of the historically I-2 zoning have bled into adjoining neighborhood areas in a visible pattern of vacancy: there is a very alarming vacancy rate among residential-zoned properties that are adjacent to industrial zoning. Neighbors have watched these conditions advance over the years and we feel strongly that these conditions will persist and worsen if land use regulations and leadership in public policy and resource allocation fail to provide adequate solutions in addressing these issues directly—by removing single use district industrial zoning policies and directing public resources towards making American Street an asset to the community rather than a liability.

> Crime is an issue generally in some parts of the neighborhood, and safety and perception of safety is of great concern specifically along American Street and the desolate industrial areas nearby. As a single use district that is only partially active in parts during weekdays, at night and on weekends the area has no users whatsoever and feels quite unsafe. At the end of 2013, there were four shootings on or near American Street in one month. It's an area that tends to attract illicit behaviors because criminals know that no one is around at night to call the police and there are no residences or other active nighttime uses nearby to provide natural surveillance. Most of these buildings are designed as fortresses with no visual

connection to adjacent streets, so the degree to which they invite illicit behaviors during the day as well is another question. For this reason, we can only assume that crime rates in this area are much higher than crime data would suggest, as this is a record of reported crimes only. Obviously, crime and perception of safety must be addressed through a number of ways unrelated to zoning, but the concentration of scattered industrial land uses within this swath of vacant land created by industrial zoning exacerbates this very serious problem. Some residents are leaving or considering leaving the neighborhood because they don't feel safe. As this continues, social fabric continues to unravel and the neighborhood therefore becomes less safe.

> Existing industrial buildings are not designed in a way that is sensitive to neighborhood aesthetics or active engagement of the street. Windowless, monolithic structures sheathed in a monotonous sheet metal and surrounded by razor wire are sited cheek by jowl with homes. Many of the examples of this typology within our neighborhood, especially the larger scale ones, are not compatible with residential character just across the street. The large footprints of many of these buildings are out of scale with neighborhood context and their complete absence of active street frontage on any side along vast stretches creates safety issues. It's simply unthinkable that these mistakes of the past would be repeated, especially given the improved market position of the neighborhood, but now we are presented with the impending construction of Veyko Inc.—a development made possible through considerable public subsidy—which offers no windows at street level and relentlessly harsh facades with no consideration for how this building relates to the public realm or nearby neighbors. This use [small scale creative production/craft manufacturing] is in line with the types of industry that might be compatible within a residential context, but unfortunately the building design reinforces the negative connotations this community has with industry and its disruption of neighborhood fabric.

> Southbound semi-trailer trucks on American Street attempt to access Girard Avenue via 2nd Street, a route that presents two difficult turns [onto Thompson from American and onto 2nd from Thompson] that have repeatedly resulted in trucks colliding with parked cars and sidewalk infrastructure. We are aware that the Commerce Department has engaged a traffic engineering firm to evaluate ways of better accommodating truck routes to serve businesses and industries on American Street, and it is our hope that this study and subsequent decisions result in ways of accommodating truck routes that place priority on the local community's interests. For some time, solutions were being considered that proposed to widen intersections to accommodate truck turning radii along this route, but this decision would be in conflict with the great need to improve American Street's streetscapes for pedestrian accessibility. More generally, as a vast right of way that is regularly traveled and crossed by pedestrian and bike traffic, American Street needs to be better designed to accommodate them safely. In addition to the roadway issues, an increase in truck traffic that could result from preserving traditional industrial zoning would also be in conflict with the neighborhood's public transit assets, walkability, and transit oriented development.

With these issues already at hand, preserving I-2 zoning in South Kensington condemns our neighborhood to continued suffering from the impacts of vacancy and neglect, with the slight and distant possibility that someday new industrial users will locate here, bringing with them their own particular negative impacts on the neighborhood and, we believe, resulting in fewer new jobs and less local economic impact than would result from our own vision. Our community does not believe these to be sound planning principles and does not believe that PCPC has the community in mind in making these decisions.

2. The persistent high vacancy rate is a strong indicator of the corridor's failure as a traditional industrial district. One of our concerns regarding the methodology used in this planning process is that we have not been presented with any analysis addressing whether or not the land currently zoned for industrial uses in our neighborhood are truly appropriate or desirable locations for future industrial uses—and if so, what indicators exist to suggest this?

As part of the analysis, maps and figures were generated showing the high vacancy rate among properties zoned for commercial uses in the Lower North planning area. This point was used to illustrate the concept that commercial corridors that once existed decades ago are no longer suitable for attracting commercial uses and that this would form the basis of rezoning underperforming commercial corridors to

accommodate other uses. A considerable share of land zoned for industrial uses is vacant. However, unlike the analysis used for vacant former commercial corridors, the fact that these properties have failed to attract new industrial users hasn't triggered a reconsideration of the appropriateness of this zoning for these properties.

Despite the many subsidies and support available to draw potential new industrial users to the greater American Street area, the corridor has for the most part remained unattractive to industrial investment since the process of attrition began in the 1960s. As for those few new industrial users that have arrived or are in the process of establishing a new location in the area, we must ask whether the subsidies used to achieve this is a fair use of public resources, given that no resources are directed to our neighborhood to help offset the negative effects of incompatible land use adjacencies.

We understand and appreciate the need for preserving land for traditional industrial uses, but clearly American Street isn't competing well with other districts that have been able to attract new industrial users and we haven't been presented with any reason to believe that the next three decades will prove any different than the previous three.

Aside from the community's perspective that Lower American street is not suitable for industrial investment, the City's own city-wide comprehensive industrial strategy has already recommended a transition away from exclusively industrial zoning in this area. As part of the 2010 Philadelphia Industrial Land Use and Market Study—sponsored jointly by the Philadelphia City Planning Commission, PIDC, and the Commerce Department—the Lower American Street corridor was found to have experienced significant industrial attrition and presents very limited opportunity for future development of medium or heavy industrial uses. This led to the land use policy recommendation that industrial zoning in the greater lower American Street area—comprising the majority of the area within SKCP's boundaries—be rezoned to facilitate development and enable a transition to “industrial residential mixed use.”

Even if continued industrial development were more viable on American Street, our community feels strongly that many types of industry are not compatible with the adjacent neighborhood fabric. Those that are compatible must be designed in a way that is sensitive to the neighborhood context.

3. Current zoning is holding back new development that would enhance neighborhood resiliency.

Between 1950 and 2010, South Kensington lost 65% of its population. Thankfully, the rate of loss has leveled off in recent years and the community is hopeful that the coming years will repopulate the neighborhood and strengthen fragmented blocks. Partially as a result of the improved market position of both Northern Liberties and Fishtown in residential and commercial real estate, South Kensington is starting to see a considerable increase in reinvestment—both in the form of new development and rehabilitation/adaptive reuse—especially in the American Street area. Many of the zoning variance approvals process requests fielded by our Planning and Zoning Committee have been seeking use variances to allow mixed use [residential and commercial] development on properties that are currently zoned industrial, but which have sat vacant for a decade or longer. Not allowing American Street to transition away from a single-use industrial district to accommodate a broader mix is a lost opportunity to strengthen the market position of South Kensington and could potentially drive away investment from areas nearby that are zoned for residential or commercial development. Given the community's hope to preserve affordable housing in South Kensington and welcome new residential development to serve a mix of incomes, it is important to also note that both residents of market rate and subsidized housing suffer from the same impacts of the industrial blight.

The neighborhood has long looked forward to the revitalization of Girard Avenue as a neighborhood-serving commercial corridor and there is great concern that the renewal of a single-use industrial land use policy on American Street will deter businesses and the potential increase in truck traffic could pose counterproductive to the vision of Girard Avenue as a walkable commercial corridor.

Furthermore, preserving I-2 zoning in our neighborhood will place an undue hardship on South Kensington Community Partners staff and community volunteers, who have limited time and resources available to manage planning and zoning issues. Use variances will continue to be requested for properties with industrial zoning and we are required to oversee community review as per our role as an RCO.

REVISIONS AND ADDITIONS REQUESTED

Rather than persisting as a liability to our community and barrier to its vitality, American Street has great potential to become its centerpiece. We embrace a vision for American Street that will activate this major neighborhood corridor with a wider range of active uses throughout the day, nights, and weekends; soften this windswept hardscape with opportunities for green stormwater infrastructure and street trees; promote context-sensitive development that harmonizes with and strengthens adjacent neighborhood fabric; and accommodate job growth and entrepreneurial activity.

1. Use IRMX base zoning in place of currently proposed I-2 and ICMX to invite a diverse range of uses.

After reviewing the Planning Commission's new zoning classifications, we feel that IRMX zoning comes closest to what the community would like to see on American Street and on most properties currently zoned I-2. IRMX would also allow for economic development opportunities and job growth along the corridor.

> COMMERCIAL

Neighborhood-serving retail uses and offices would be welcomed by the community. Big box retail or strip mall style development would not be supported.

> RESIDENTIAL

American Street is an opportunity to diversify South Kensington's housing options and allow for the creation of live-work options to promote small business development and creative entrepreneurialism.

> INDUSTRIAL

We encourage job growth and entrepreneurialism in a way that strengthens neighborhood integrity. Though there is a perception that transitioning away from I-2 zoning would mean a reduction in potential job capacity, we believe our vision includes the opportunity for as many, if not more jobs than would be accommodated by I-2 zoning. The community's vision welcomes small-scale artisanal production and craft manufacturing as well as light industrial uses that have a low impact on neighboring residential streets and non-industrial businesses nearby.

IRMX zoning allows for the following industrial uses as of right:

(a) Artist Studios and Artisan Industrial.

Spaces used by artists for the creation of art or the practice of their artistic endeavors, as well as uses that produce consumer goods by hand manufacturing, involving the use of hand tools and small-scale, light mechanical equipment in a completely enclosed building with no outdoor operations, storage or regular commercial truck parking/loading.

These uses are well aligned with the community's vision. IRMX also allows for the following by Special Exception from the ZBA:

(b) Limited Industrial.

Uses that process, fabricate, assemble, treat, or package finished parts or products without the use of explosive or petroleum materials. This subcategory does not include the assembly of large equipment and machinery and has very limited external impacts in terms of noise, vibration, odor, hours of operation, and traffic.

These uses are adaptable to neighborhood context, with the exception of uses that are exclusively single-use warehouses, uses within the transportation and logistics cluster, and uses that pose environmental or health hazards such as heavy metals or VOCs. These non-supported uses should be prohibited through the proposed district overlay described below. We feel that imposing the limitation of a Special Exception from the ZBA creates a necessary and appropriate opportunity for the community to review potential impacts of light industrial uses through its regular zoning variance approvals process.

2. Establish a district overlay and guidelines to make new development harmonize with existing neighborhood character

IRMX zoning could result in some outcomes that would not be embraced by the community and there is a need to create a more refined set of land use regulatory measures tailored to allow for development that meets the needs of multiple stakeholders. The current PCPC draft Lower North plan proposes the following district overlay controls:

1. Maintain drive aisles for consistent truck traffic access.
2. Add curb bump outs to shorten crosswalks at prominent intersections.
3. Place parking and loading facilities along American Street and away from residential streets.
4. Create buffers of parking and/or landscaping between industrial and residential uses.
5. On East-West connecting streets, restore street walls and allow infill housing on existing residential streets.
6. On East-West connecting streets, create architectural scales and use materials complementary to existing residential uses.

We request further clarification from the Planning Commission staff on the specifics of these overlay controls. At face value, some of these may resonate with the community, but others may not. We propose the following controls be included in the South Kensington IRMX overlay district:

1. LIMIT RESIDENTIAL DENSITY

It is understood that the IRMX zoning classification was created to enable adaptive reuse of existing formerly industrial buildings, rather than to allow for new development of residential buildings. The development regulations specified in IRMX zoning, therefore, employ 150 year old industrial building standards for new residential development. In addition to addressing lot coverage standards, the number of residential units developable needs to be regulated by the size of the parcel, as it is with classifications less dense than CMX3/RMX3. Given the large size of many of the formerly industrial vacant lots, the 500 FAR, and no maximum on the number of units, there is a need to ensure that new residential development within IRMX zones doesn't result in an intensity of residential density that is not appropriate for the neighborhood context.

2. ENFORCE DESIGN GUIDELINES TO APPLY TO ALL IRMX OVERLAY DISTRICT DEVELOPMENT REGARDLESS OF USE

The following design guidelines are proposed:

- > To promote eyes on the street and engagement with the public realm, each building elevation should include a minimum percentage of windows. For facades with street frontage, windowsills should be placed below eye level relative to a person on the sidewalk.
- > The expansive width of American Street would be exacerbated by front setbacks. A required zero setback on American Street would make buildings engage the street; exceptions could be made for shallow setbacks for landscaping, but *not* for surface parking.
- > Any surface parking should feature well-maintained green buffer areas around the perimeter. We would request that some controls be put in place to ensure that surface parking is kept at a minimum and is in proportion to the size of the building.
- > Façade lighting should be required on any façade with street frontage.
- > Any perimeter fencing should be screened by planted areas. Razor/barbed wire should not be permitted.
- > High quality, durable, variable materials must be integrated into façade designs to prevent monolithic treatments that would be eyesores for neighboring residences.
- > Grounds visible from the public realm or neighboring properties must be well maintained and not kept in an unsightly manner.

3. Market South Kensington as a place where creative culture thrives

Many potential industrial users whose businesses aren't appropriate for this neighborhood context could nevertheless establish themselves in South Kensington as of right. Branding and marketing strategies could be used to promote sites and attract industrial users who are interested in being a part of this community and the vision for American Street. The City's "Destination Frankford" website is an example of how identity branding and marketing could draw the right mix of businesses to American Street: <http://destinationfrankford.com/>

4. Make right of way improvements to serve all users

As an excessively wide right of way, American Street presents a foreboding challenge to pedestrians and cyclists. With so many decisions having been made over the years to accommodate trucks and industries rather than local residents, the community would like to see the City acknowledge that South Kensington's streets should be designed to serve its residents first and foremost.

In the coming few years, a \$7m TIP capital grant will be directed towards improving the American Street right of way. A specific streetscape design for American Street should be in place in advance and created through a process that engages the community in discussing the specifics of the design. Generally speaking, the community would like to see the roadway significantly narrowed, bike lanes, bump outs at corners to reduce crossing distance, streetscape greening, and pedestrian scale lighting.

Truck traffic should be rerouted towards Lehigh rather than towards Girard in order to avoid turning radius conflicts on Thompson Street and 2nd Street. Signage should be installed to direct trucks along a new truck route. The route can also be enforced through redesign roadways to deter truck traffic where it is not desired and cannot be accommodated.

We have noted that the Planning Commission envisions a northbound bike lane on 5th Street and southbound on 2nd Street. From the neighborhood's perspective, being closely familiar with motorist habits on these streets, these are not advisable routes for safe biking. Riding bikes on these streets would be equally hazardous with or without a bike lane—and providing a bike lane on either of these streets may belie the danger of using it and mislead cyclists into thinking they will be safe. American Street's excessive right of way offers a much more sensible solution for a central north-south bike route through the neighborhood.

5. Address community health and safety concerns

The city should provide resources for independent [not controlled by entities who have an interest in preserving industry on American Street] environmental testing to ensure that existing industrial users aren't creating hazardous conditions for nearby residents, schools, and other community uses. The community supports the preservation of existing industrial users that aren't threats to the health and safety of our residents. Given the neighborhood's history of intense industry, formerly industrial vacant lots should also be tested to ensure that contaminants aren't migrating from vacant land onto occupied adjacent properties.

6. Preserve land for open space on American Street

To complement the vast amount of public resources that have gone toward industrial businesses in our neighborhood, public resources should be dedicated to offset the negative impacts that incompatible land use adjacencies and blight have imposed on our community over the years. On American Street, an appropriately sized and located piece of vacant public land should be preserved as an opportunity for a neighborhood open space amenity. An American Street open space would not only be centrally located in South Kensington, it would also help buffer the industrial character of American Street from residences nearby and could be tied in to green stormwater infrastructure.

From: [Aissia Richardson](#)

To: [David Fecteau](#)

Subject: Re: Updated Corrective Zoning Recommendations for the Lower North District Plan

Date: Wednesday, April 02, 2014 8:17:28 AM

Hi David:

Thanks. Since I've missed a few meetings, I'm trying to divine how the councilman's changes affect the original recommendations.

Sometimes what a politician wants, what a community wants and what planners believe are best can be in conflict.

There was a lot of inspiring community feedback from the public meetings, a sense of ownership of the process.

When the final document lacks the authentic input of end users it becomes a hollow representation of the hopes and desires of those that will eventually inherit a fractured plan.

I asked about input because SEPTA's capital budget is now available online as of yesterday. They are making significant investments in North Philadelphia infrastructure like Susquehanna/Dauphin station on BSL. While I understand the zoning issue is primary, SEPTA's investments should be noted in the plan. Also, streetscape greening for North Broad surveying is being done. I anticipate greening construction will start when it gets warm.

Greening continuity should be a plan focus as well. If the major thoroughfare looks exceptional but blight is leading to the corridor, an emphasis on greening should be included in future planning on access streets to the North Broad corridor. Finally, I had a disturbing conversation with Commerce staff about the Susquehanna/Dauphin area not being a defined commercial corridor. I would strongly disagree and posit that the commercial corridors close to transit are a result of the transit foot traffic. Each transit node is a defined commercial corridor worthy of investment to highlight the economic value of transit.

As you know, I am not a professional planner but am committed to community development so even low income residents can realize the benefits of their tax dollars on the places important to them.

Respectfully submitted,
Aissia