



September 17, 2018

Ian Hegarty
Upper North & Upper Northwest Community Planner
Philadelphia City Planning Commission
One Parkway Building
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Dear Mr. Hegarty,

Enclosed, please find the final comments of the Chestnut Hill Business District on the Philadelphia City Planning Commission's Draft of the Upper Northwest District Plan. These comments have been reviewed and approved by the Board of Directors of the Chestnut Hill Business Improvement District (CHBID), the Board of Directors of the Chestnut Hill Community Development Corporation (CHCDC), and the Board of Trustees of the Chestnut Hill Business Association (CHBA). As part of our stakeholder outreach process, the plan website, information on proposed zoning changes, and our proposed priority issues were shared with the full membership of the CHBA and mailed in hard-copy form to all property owners in the CHBID. Stakeholders were provided with one month to share feedback before these comments were finalized and sent to our board of directors. As a result, I feel confident that these comments are reflective of the priorities of Chestnut Hill's business community.

Thank you for your work on the preparation and refinement of this important District Plan. We look forward to reviewing the final approved document and working with your office on advancing its implementation in our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Dawson". The signature is stylized with a large, looping "P" and a long, horizontal stroke extending to the right.

Philip Dawson
Executive Director
Chestnut Hill Business District

8514 Germantown Avenue
Philadelphia, PA 19118
215-247-6696
pdawson@chestnuthillpa.com



Chestnut Hill Business District: Final Comments on PCPC Draft Upper Northwest District Plan

Top Priorities

- **Streetscape** | The Business District believes that the Plan must advocate for needed streetscape infrastructure renewal in Chestnut Hill, prioritizing lighting, crosswalks, and maintenance of historic paving materials. This infrastructure has been demonstrated to be in a state of disrepair, constituting a hazard to both drivers and pedestrians, and its replacement is not adequately funded. In addition, the intersections of Bethlehem Pike & Stenton Avenue and Germantown & Northwestern Avenues should be added to the list of proposed local gateways slated for improvements.
- **Zoning** | The Business District supports the concept of focusing growth around Chestnut Hill's commercial corridors through corrective zoning and up-zoning. Property owner feedback has been supportive of rezoning CMX-1 properties to CMX-2 and CMX-2.5; however, proposed applications of CMX-2.5 zoning should be judiciously limited to areas with special potential for redevelopment. In addition, the Business District is supportive of growth in the small commercial node near the Chestnut Hill East station, and advocates for investment in public water infrastructure in this area to support it.
- **Public Transportation** | The Business District supports the proposed public transit improvements to reconstruct Bethlehem Pike bus loop, consolidate bus stops, and add transit shelters in Chestnut Hill. The District supports reassessing optimal bus routing through the neighborhood in order to improve roadway safety, and providing for maintenance of former trolley infrastructure to improve roadway conditions and potentially facilitate the activation of a limited-service, heritage streetcar line to stimulate tourism.
- **Historic Preservation** | In order to protect the integrity of historic buildings and safeguard Chestnut Hill's competitive advantage as a destination, the Business District supports putting historic protections in place in advance of planned rezonings. The District supports surveying historic properties, creating improved financial and regulatory incentives for adaptive reuse, and increasing protections through local designation and/or a historic district.
- **Green Space** | The Business District supports enhancing green space and connections to recreation through completion of the Cresheim Valley Trail, allocating additional resources to tree planting and care, and better maintaining pedestrian and vehicular connections to the Wissahickon.

Detailed Comments

Page 10, Historic Street Paving Thematic District: The existence of this thematic district is a good start, but more deliberate action and changes to prevailing work practices are needed in order to preserve these historic thoroughfares. Given the concentration of well-preserved historic streets in the Upper Northwest, the City should implement policies that are conducive to the proper maintenance and restoration of the historic paving materials. Currently, roadway patches and excavations by public utilities are often performed using a “one size fits all approach” with tar and asphalt, rather than replacing the historic paving material. As a result, the functional and visual integrity of historic streets is often progressively damaged, and secondary repairs must be scheduled on a future date to reconstruct the patched area, if they are ever scheduled at all. A better approach would be to require the City of Philadelphia’s Streets Department and PennDOT to deploy dedicated units within their roadway maintenance crews who are skilled in the repair of historic paving materials to make proper repairs on damaged streets when needed. Public utilities and private contractors who perform excavations in historically-paved streets should likewise be required to properly replace the historic pavers they remove. This could be facilitated by providing special certifications to paving contractors and requiring that one of these be used to perform the repairs, and/or by offering the option of paying an additional fee to the city/state so that their respective special roadway maintenance units could perform the work.

Pages 22-23, Neighborhood Centers: This section of the plan should include mention of Chestnut Hill as a destination commercial corridor in Northwest Philadelphia, as the neighborhood contains over 175 small businesses and receives over 310,000 visitors per year.

Pages 30-33, Thrive Recommendations:

- **(Neighborhood Centers) Priority Recommendation 1:** While there is a legitimate need to prioritize coordinated planning strategies and investment of public dollars in commercial corridors in economically-depressed areas of the Upper Northwest District, this recommendation fails to acknowledge a number of pressing infrastructure needs in Chestnut Hill’s Germantown Avenue business district. Specifically, there is an urgent need for comprehensive pedestrian lighting renewal in the business district, where old fixtures have begun to lean and break, and where independent expert surveys have found inadequate nighttime illumination levels. Additionally, there is a need to replace many deteriorated areas of the Germantown Avenue roadway, including restoration of missing/damaged Belgian block and replacement of cement paving in crosswalks and around trolley tracks. While lighting improvements are partially funded, there is currently no funding allocated for the necessary street improvements in this area. Allocating sufficient resources to these projects is critical to the safety of drivers and pedestrians in this part of the city, and maintains the appeal of a historic commercial corridor which is an important economic engine for the city. Finally, the Implementing Agencies and Partners section of this recommendation should note PennDOT as a relevant entity, given that the state has jurisdiction over Germantown Avenue in much of the district.
- **(Housing) Priority Recommendation 5:** The Housing and Commercial Development Strategy articulated here and on Pages 26-27 seems sensible and in the best interest of Chestnut Hill. With its walkable downtown, commercial amenities, and good transportation access, the

Chestnut Hill Business District can accommodate growth in accordance with zoning regulations and a strong ethic of historic preservation.

Pages 30-33, Connect Recommendations:

- **(Transit) Priority Recommendation 14:** The Chestnut Hill Business District generally supports these recommendations to enhance service and transit facilities along the Route 23. Consolidation of stops would improve trip times while adding additional street parking in the district due to the removal of some bus zones. While more information is needed regarding the proposal to reconstruct the bus loop at Germantown Avenue and Bethlehem Pike, such a project could improve deteriorated passenger facilities there and remove obsolete infrastructure that presents ongoing safety concerns.
- **(Transit) Recommendation 15:** The Chestnut Hill Business District supports both of these proposals for increasing transit ridership on these rail lines, making it easier for residents, workers, and visitors to access Chestnut Hill.
- **Additional Proposed Recommendation (Transit/Complete Streets):** The draft plan makes prominent mention of Germantown Avenue and its heavily-used Route 23 bus, but the need for planning around the future of the route's former trolley infrastructure is conspicuously absent from the document. Deteriorating tracks and paving, old catenary poles, and miles of electrified catenary are significant elements of the Germantown Avenue streetscape throughout the entire district. In the short term, most are in need of significant maintenance, and some pose safety concerns for drivers, pedestrians, and cyclists, but there is not currently sufficient funding allocated for proper upkeep by SEPTA. This plan would be an apt place to make recommendations about the future of this trolley infrastructure in concert with SEPTA long-range planning staff, given that it has now been out of use for over 20 years. As a result of funding limitations/priorities, SEPTA's long-term interest in moving towards a fleet of articulated LRVs, and the segmentation of the original 23 bus route, it now seems highly unlikely that a complete restoration of commuter trolley service on this line would be feasible in the foreseeable future. Given this reality, and the fact that the track infrastructure is in a state of poor repair in much of the district, there should be adequate planning for maintenance/renewal of the trolley infrastructure going forward. As SEPTA replaces its legacy PCC fleet with new LRVs in coming years, such maintenance could facilitate the potential reuse of the line as a limited-operation heritage streetcar route, which could drive tourism and business to the Upper Northwest.
- **(Complete Streets) Recommendation 20:** The Chestnut Hill Business District supports this recommendation to close sidewalk gaps between neighborhoods and parks/recreation centers. Given the district's proximity to the Wissahickon, this strategy would make it easier for recreational visitors to reach the commercial corridor.
- **(Complete Streets) Recommendation 22:** The Chestnut Hill Business District is pleased with the inclusion of Springfield Avenue on this list for crosswalk enhancements. However, a more thorough evaluation of Chestnut Hill's cross streets should be undertaken in order to identify other streets which meet the stated guidelines. While Springfield Avenue is a disjointed intersection which is in need of improvements, other streets which cross Germantown Avenue

between the 7900 and 8600 blocks more closely match the given standards for higher retail density, higher pedestrian volumes, and crosswalks in a state of disrepair, so these should be added for consideration.

- **(Utilities) Recommendation 26:** The Chestnut Hill Business District would be supportive of this proposal, provided that proper restoration of the street and sidewalk infrastructure is undertaken, and provided that good communication and timeline management are in place to minimize disruption to small businesses.
- **Additional Proposed Recommendation (Utilities):** As utilities investments are considered, the city should pay special attention to areas which lack public water/sewer service, yet are located within the areas that the plan designates for growth or infill development. These areas, such as the zone in the vicinity of the Chestnut Hill East regional rail station, would benefit from an investment in utilities infrastructure in order to support the desired growth.

Pages 56-59, Renew Recommendations:

- **(Open Space) Recommendation 28:** The Chestnut Hill Business District fully supports this recommendation to complete the Cresheim Trail, which would strengthen the only direct connection between the Wissahickon trails and the Germantown Avenue commercial corridor.
- **(Tree Cover) Recommendation 35:** Planting additional trees is a good recommendation, but it should be undergirded with a recommendation that the City provide increased funding for pruning of existing trees and removal of dead trees. Although the city has jurisdiction over all street trees, years of insufficient funding for this program have left a 2-3 year wait for dead tree removal, and a 6-8 year wait for street tree pruning. Without proper funding, this ambitious program may not be sustainable, especially in lower income neighborhoods in the Upper Northwest where residents may lack the means to provide ongoing tree care.
- **(Historic Preservation) Recommendations 36-39:** The Chestnut Hill Business District is supportive of efforts to survey historic properties, create improved incentives for their reuse, and identify new funding sources for reuse. The Business District is supportive of the proposal to create a local historic district along Germantown Avenue in order to better protect historic properties and safeguard the unique character of the business district, which provides a critical competitive advantage over other nearby shopping destinations.
- **(Public Realm) Recommendation 41:** The Chestnut Hill Business District is supportive of the proposed gateway improvements at the Cresheim Trail and Germantown Ave/Bethlehem Pike areas in concept, provided that there are engagement processes which allow local stakeholders to such as the Business District to help guide design, planning, and implementation. In addition, the intersections of Bethlehem Pike & Stenton Avenue and Germantown & Northwestern Avenues should be added to the list of proposed local gateways slated for improvements.



September 19, 2018

To: Philadelphia City Planning Commission
1515 Arch Street
Philadelphia, PA 19102

From: Mt. Airy USA
6703 Germantown Avenue, Suite 200
Philadelphia, PA 19119

Re: Comments on the Philadelphia 2035 Upper Northwest District Plan draft

On behalf of Mt. Airy USA, a 501(c)3 community development corporation, I'm writing to provide our organization's comments on the Upper Northwest District Plan. Broadly speaking, we are pleased with the Planning Commission's findings and recommendations and we are grateful to have been included in the process. We understand and welcome the priority given to Wayne Junction and Central Germantown as those crucial areas move forward.

With specific regard to Mt. Airy, we appreciate the ways in which the Commission has examined how the neighborhood can continue to thrive, connect, and renew. Our comments are below in two self-explanatory categories.

WE SUPPORT: Items of particular note we wish to acknowledge and commend the Commission for including.

- Increasing density of commercial parcels along commercial corridors, both along Germantown Avenue and especially smaller corridors and nodes like Chew Avenue, Hortter & Greene, Washington Lane, etc.
- Increasing residential density along selected transit-oriented development sites. We found the area around Carpenter Station particularly interesting.
- Increased attention and resources to historic preservation, including through new local Historic Districts.
- Reuse of vacant land and structures through affordable housing, stormwater management, and community gardens.



- Improving frequency and fare structure of the two SEPTA Regional Rail Lines.
- The creation of the planned Cresheim Trail between Germantown and Stenton Avenues, and eventually on to Montgomery County.
- Managing the five-point intersection near Stenton Station with a new roundabout.
- The reactivation of old restrooms/addition of new ones and the addition of wifi hotspots within the Wissahickon Valley Park.
- Better connectivity and pedestrian safety along the Lincoln Drive and Wissahickon Avenue corridors.

WE RECOMMEND: A few added suggestions we hope can be considered for inclusion in the final adopted Plan.

- We are grateful that the installation of new crosswalks on Germantown Avenue are explicitly mentioned in the Plan and agree that Hortter Street, Carpenter Lane, and Durham Street are all appropriate locations. However, we recommend making these crosswalks a priority. As the Avenue is so highly trafficked and so many of the cross streets (especially between Sedgwick and Upsal Streets) are staggered, it makes crossing the Avenue challenging for pedestrians. We also recommend adding crosswalks at Westview Street and Pelham Road. There are dozens of businesses between Upsal and Sedgwick Streets, and only one proper crossing, at Phil-Ellena Street, where the light to cross is very short.
- We recommend stronger language regarding Lincoln Drive and actually recommend making it two lanes (one each direction) for its entirety between Allens Lane and Ridge Avenue. As referenced in the Plan, Lincoln Drive was built within the City Beautiful motif, and it has the opportunity and - we think - the precedence to return to that. As planned, PennDOT's current building of Lincoln Drive will likely make no dent in the problems that currently exist: high speeds, lots of crashes, and severely impaired pedestrian safety. We think that making Lincoln Drive two lanes with a landscaped median and ample room for parking in the residential areas and shoulders in the higher trafficked areas will result in a pleasant and beautiful park drive, and more importantly, a safer situation for pedestrians *and* drivers that keeps traffic moving.



- On page 44 of the Draft, a map shows sidewalk gaps and priority connections. We recommend drawing closer attention to the gap between Carpenter's Woods and Wissahickon Valley Park. Specifically, we recommend adding a trailhead marker at N. Mt. Pleasant Avenue and N. Mt. Pleasant Place. Note the severe disconnection between that trailhead and those leading into and from Carpenter's Woods. In addition to being far apart in what should be a natural connection, they are separated by the unsafe barriers of Mt. Pleasant Avenue and Wissahickon Avenue, both without sidewalks.

Thank you again for a thorough reading of the Upper Northwest District and for giving all stakeholders, including and especially the public, ample opportunity to participate.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Copeland". The signature is stylized with a large, looped "C" and a long, sweeping underline.

Brad Copeland
Executive Director
Mt. Airy USA



September 21, 2018

Eleanor Sharpe, AICP, LEED AP
Executive Director, Philadelphia City Planning Commission
1515 Arch Street
Philadelphia, PA 19102

Dear Ms. Sharpe:

Thank you for the great work and dedication of the Philadelphia City Planning Commission to develop a District Plan for Philadelphia's Upper Northwest, and for the ambitious Philadelphia 2035 Plan that is now so close to completion. The Conservancy has been proud to participate, and glad to better connect with our community partners in Germantown, Mt. Airy and Chestnut Hill. This memo provides more detail than the joint memo submitted by us with other Chestnut Hill RCO and stakeholder organizations. Please consider the following document to be the official submission of the Chestnut Hill Conservancy.

These comments by the Conservancy predominantly include requests for changed and added language to correct and clarify. Some of the most important of these requests also relate to consistently noting the importance of balancing protection of water, and environmental and historical resources with development priorities, especially in "Limited Growth Areas". In addition, several comments relate to recognizing that many issues and Recommendations have been applied to Focus Areas, but that could and should also apply to the overall district.

We are grateful for this opportunity to submit our comments on the Final Draft of the Upper Northwest District Plan, and for the extra weeks granted to allow for additional public outreach after the final draft was released with a major change from what had been presented at public meetings. This change, the removal of the zoning designation RSD-C to limit subdivision in areas poorly served by infrastructure and/or in environmentally-sensitive areas, was greatly supported at public meetings. The return of this designation is among the highest priority requests by the Conservancy, Friends of the Wissahickon, and many other organizations in this district.

Although the Upper Northwest is not the only watershed district in the City, the Wissahickon is the only watershed with the development controls of a watershed overlay district. For this reason, the introduction of RSD-C in this 18th district plan makes sense and is an important concept to be introduced within Philadelphia2035. With development interest soaring, all of our watershed communities should have similar controls, but let us please start where the environmental impact is already well studied and understood.

In addition to the re-introduction of RSD-C to Philadelphia2035 in this district plan, we are also

requesting the elevation of current recommendations 7 (Thrive), 33 and 36 (Renew) to priorities with some additional language, and the addition of six new recommendations (one each in Thrive and Connect, and four in Renew). These are:

THRIVE

7. **MAKE PRIORITY!** *Add language:* "Limit subdivision of large lots in areas with limited road access, environmental sensitivity, or incomplete...networks , and that wouldn't add to the city's supply of affordable housing." Change: "...~~purchase of~~ conservation easements" to "...securing conservation easements," and add "or down-zoning." Add City Agencies to "Implementing Agencies & Partners"
- NEW. *ADD RECOMMENDATION:* Encourage conservation of publically- and privately-held land in watershed communities (or, "as identified as priorities for conservation").

CONNECT

- NEW. Review use of streets in areas where current use by public transportation creates a safety issue.

RENEW

33. **MAKE PRIORITY** *Add bullet point:* "Create other curbs to development on environmentally sensitive watershed land." Add nonprofits to "Implementing Agencies and Partners." Change "Support conservation easements..." bullet to add ", including recognition of reduced value of undevelopable land,"
36. **MAKE PRIORITY!** *Change language to:* "Create regulatory, financial, and other incentives for reuse of historic properties. Encourage ~~Allow~~ a wider range of uses, additional housing units, and relaxed size dimensional requirements for properties listed.. ." Add nonprofits to "Implementing Agencies & Partners"
- NEW. Support sustainable use of the Water Tower Recreation Center and others throughout the district.
- NEW. Celebrate and help to retain healthy heritage trees and support planting of future heritage trees throughout the district.
- NEW. Utilize and support other tools to protect significant resources including conservation districts (in conjunction with preservation of individual resources), demolition moratorium, preservation easements, or (if created) preservation districts.
- NEW. Make active use of the Neighborhood Conservation District Overlay tool, in conjunction with efforts to protect individual historic buildings, to promote urban design objectives in residential neighborhoods.

Sincerely,



Lori Salganicoff
Executive Director

cc: Councilwoman Cindy Bass

Laura Spina, Ian Hegarty, Matt Wyson, Philadelphia City Planning Commission

COMMENTS TO THE UPPER NORTHWEST DISTRICT PLAN FINAL DRAFT

Submitted by the Chestnut Hill Conservancy

September 21, 2018

Pre-amble, history page: INSTITUTIONS

Request for added language:

In 1990 Chestnut Hill Conservancy and Friends of the Wissahickon created the nation's first accredited urban land trust.

Page 4: HOMEOWNERSHIP

Request for added language:

Woodward and Houston developments in Chestnut Hill and Mt Airy were created to be and remain rental – a stabilizing force as renters behave like property owners and the family-owned management corporations maintain the properties well. With family transitions, this may change.

Page 7: CONNECTIONS AND SAFETY FOR CYCLISTS AND PEDESTRIANS

Note, a woman was killed by a bus at Germantown Ave and Gravers Lane in 2016, and many have mentioned heavier use of secondary streets as GPS apps re-route people from clogged arterials.

Page 8: TIMELINE

1990: First conservation easement granted to Chestnut Hill Conservancy (formerly the Chestnut Hill Historical Society)

Page 9: TREE COVER

Request for added language:

In addition to city and nonprofit street tree efforts, some trees within properties are protected through conservation easements. "However, many mature ~~street~~ trees are nearing the end of their life cycle.", and many others are often lost to development.

Page 10: HISTORIC SITES AND ASSETS

Request for changed language in intro:

Thousands of properties are listed on the honorary National Register, but only hundreds are protected by listing on the Philadelphia Register of Historic Places or by preservation easement. Historic resources in Chestnut Hill and parts of Germantown and Mt. Airy have been surveyed, although a comprehensive survey of the entire Upper Northwest District has not been conducted.

Page 11: A simple statement about the difference between National vs.

Philadelphia Register listing would be extremely important here. They are mixed in the descriptions below, and are alike in that they use the same criteria for designation. They are the opposites, however, in protection. A lot of people are not aware that the much more prevalent National Register listing offers no preservation protection, only recognition (except with federally funded projects)

CHESTNUT HILL HISTORIC DISTRICT

"follows the natural boundaries of the neighborhood, aside from the Chestnut Hill Village corner,"

Page 13: HISTORIC PRESERVATION

Thanks for the shout-out!! Could you please add: "The organization holds the Chestnut Hill and Wissahickon Archives, and today manages..."

LANDSCAPE CONSERVATION

...the Chestnut Hill Conservancy (in partnership with Friends of the Wissahickon) have been...

Please change "purchasing easements" to "securing easements" It's more accurate

STRONG COMMUNITY COHESION TODAY

Request for added language:

"The Chestnut Hill community uniquely organizes its RCOs through one 'Convening RCO,' managed by the CHCA, to better coordinate community responses."

Page 16: EXISTING LAND USE

It would be helpful and instructive to have the three communities' data illustrated in three graphics.

Page 19: EXISTING ZONING

Request for added language:

Minimum lot size allowed under current zoning in much of the area covered by the WWO does not conform to existing lot sizes, particularly in the most sensitive privately-owned watershed land area.

Page 22: THRIVE

Request for added language:

In intro, please add: "Negative aspects of growth, such as traffic, increased stormwater, overtaxed sewer and septic systems, loss of unprotected historic resources, parking impacts, and out-of-character... .

In NEIGHBORHOOD CENTERS please add a paragraph on Chestnut Hill's neighborhood center, which is a regional destination in addition to being a local-serving resource (Philip Dawson to draft).

Page 25: HOUSING

Request for added language:

In first paragraph: ...through the rehabilitation/adaptation of existing houses and historic buildings...

CH Conservancy Comments to the Upper NW District Plan Final Draft

How to add concept – “preference should be given to infill parcels and adaptive reuse, over teardown redevelopment” In third paragraph: change “apartment” to “multi-family” to also include condo development
Add concept – “where possible, adaptive reuse of historic structures should be incentivized. Incentivize public benefits in the conservation and preservation realm to promote affordable, accessible, ...

Request for added language:

At end of final paragraph: “Although it may seem cost prohibitive to renovate buildings with hazardous materials, it is equally cost prohibitive to demolish them. Throughout the district, there are extensive positive examples of renovation and maintenance of historic buildings.

Page 26: Typo under Infill-Area caption – Gernally meant to be Generally?
Extend “core growth area” along Bethlehem Pike.

Page 27: INFILL and LIMITED GROWTH AREAs

In infill and limited growth areas, encourage protected single-family structure conversion to multi-family, to help address housing demands

Page 31: GOOD DESIGN IS GOOD BUSINESS

This is also an important concept in Mt Airy and Chestnut Hill, but only Germantown is mentioned. Fine to have Focus Areas, but a reader doesn’t expect this to just be about one of the Focus Areas.

Page 41: UTILITIES

Request for added language:

PWD’s efforts currently focus predominantly on areas served by combined sewer systems. Large sections of the district, most notably in Chestnut Hill and Mt. Airy, have aging septic systems and no public sewer. The affect of these septic systems on the health of the watershed is not well understood.

Page 46: FLASH FLOODS

Include as part of a Storm water and flood management section.
Does the pervasive amount of aging septic need to be mentioned here?

Page 47: TOOL BOX: FLOOD MITIGATION

Request for added bullet in Planning and Policy:

Encourage the use of conservation easements and downzoning to mitigate effects of greater development where there are flood risks

Page 48: RENEW

Request for language to intro:

These parks and resources are also protected by hundreds of acres of environmentally-sensitive privately-owned open space

Page 50: NEIGHBORHOOD PARKS AND RECREATION

Request for added language:

The Chestnut Hill Water Tower Recreation Center is the City's most heavily used site. Planning for the update of this facility, including consideration of the fields and historic buildings, would allow for this heavy use to continue and expand

Page 51: WATER QUALITY

Request for added language:

Water quality is also affected by development in the watershed, as increased impervious surfaces decrease environmentally-sensitive open space. Reducing new development in environmentally-sensitive areas helps avoid worsening existing storm water problems. Protection of environmentally- sensitive, privately-owned land within the Wissahickon Watershed will help to protect water quality.

PROPOSED WISSAHICKON OVERLAY EXPANSION:

Request for added language:

Expanding the Wissahickon Watershed Overlay District would also connect the Wingohocking watershed to the Chestnut Hill Conservancy's Easement Program, which is available for conservation priorities within the Wissahickon Watershed, regardless of neighborhood or municipal boundaries.

TREE COVER

Add PECO to the list of partners focusing on street trees.

Request for added language:

Mature "heritage" trees within properties provide an important service managing stormwater, in addition to cleaning the air and beautifying the neighborhoods. Older trees accomplish all of these much better than younger trees. Future work by nonprofits in partnership with City agencies will need to celebrate and help to retain healthy heritage trees.

Page 52: CULTURAL, HISTORICAL AND ARCHITECTURAL RESOURCES Paragraph 1, please add: A general recommendation is therefore to collect and add to existing inventories of these resources, and prioritize efforts to list the most valuable, and vulnerable, places

Paragraph 2, please add: ...Historic Places, financial incentives, as well as zoning incentives...

Request for added language as paragraph 3:

Other tools, such as conservation district overlays, preservation easements, and perhaps preservation district overlays, are among other important tools to protect historic resources.

CH Conservancy Comments to the Upper NW District Plan Final Draft

Request for added language at end:

Adapting and reusing city-owned historic assets should be prioritized over new construction where possible and feasible.

PRESERVATION STRATEGY TOOL BOX

Change the last bubble to: "Adaptive Reuse of Historic Assets"

Page 53: PROPOSED LOCAL HISTORIC FACILITIES Facilities? Did you mean Districts?

Please change sidebar from "Thematic districts within ~~the Chestnut Hill neighborhood~~" to being "within the Upper NW District."

Please change the "~~George Woodward Developments Thematic District~~" to the "Woodward/Houston Developments Thematic Districts." That's more accurate and the Houston descendants really care!

Consider extending the Germantown Ave historic district up the Bethlehem Avenue spoke.

Please add in the final paragraph: "Because of the Upper Northwest's well-preserved unique building stock, several historic districts and a number of individual buildings are proposed..."

"These proposed ~~districts~~ listings..."

"The plan proposes that these historic districts and individually protected historic buildings will be paired with zoning overlays in primary growth areas"

Page 60: OPEN SPACE

There is no Chestnut Hill Cricket Club. It's the Philadelphia Cricket Club.

APPENDIX

If the excellent Upper NW Historic Preservation Memo cannot be included in the Appendix, please include a link to this as well as other studies, inventories, etc. So much has been collected, it'd be a shame to not at least have those resources noted.

Comments on Recommendations




THRIVE

1. An important recommendation across the entire district. Please *change to* “Renew streets and sidewalks and support businesses along the district’s commercial corridors and spokes” but retain Focus Areas
2. *Change to* “Plan for the reuse of underutilized significant buildings, such as Germantown High School”
3. –
4. –
5. *Add language:* “Direct multifamily housing development, both new construction and adaptive reuse/expansion of existing buildings, to commercial streets...”
6. *Change language:* Preserve large historic houses and properties, and encourage development without adding new construction in “Limited Growth Areas” by allowing adaptive reuse of designated historic resources.
7. **MAKE PRIORITY!** *Add language:* “Limit subdivision of large lots in areas with limited road access, environmental sensitivity, or incomplete...networks, and that wouldn’t add to the city’s supply of affordable housing.” *Change:* “...~~purchase of~~ conservation easements” to “...securing conservation easements,” and add “or down-zoning.” Add City Agencies to “Implementing Agencies & Partners”
8. –
9. –
10. –
11. An important recommendation across the entire district. Please *add language:* “Celebrate local history to attract publicity and create jobs in existing cultural resources such as Germantown’s Market Square *Note: there’s a Market Square in Chestnut Hill too.*”
12. –
13. –
- NEW. *ADD RECOMMENDATION:* Encourage conservation of publically- and privately-held land in watershed communities (or, “as identified as priorities for conservation”).

CONNECT

14. Add “Improve maintenance of infrastructure. Provide maintenance and restoration funds for granite paving.” Resolve the status of legacy transportation investment
15. Add FOW, CHBD, other nonprofits to “Implementing Agencies and Partners”
16. –
17. Add nonprofits to “Implementing Agencies and Partners”

CH Conservancy Comments to the Upper NW District Plan Final Draft

18. *Change language:* Design and ~~build~~ implement safety improvements to reduce ~~crashes~~ accidents and pedestrian vulnerability throughout district in ~~High Injury Network~~ locations.
19. –
20. *Add language to the end:* “and commercial corridors”
21. –
22. *Add language:* “Install new crosswalks on Germantown Avenue to improve pedestrian safety, especially in areas with... “
23. –
- NEW. Review use of streets in areas where current use by public transportation creates a safety issue.
24. –
25. –
26. *Add language:* “Install fiber optic cable underground along...”
27. –
- RENEW**
28. –
29. –
30. –
31. –
- NEW. Support sustainable use of the Water Tower Recreation Center and others  throughout the district.
32. –
33. **MAKE PRIORITY** *Add bullet point:* “Create other curbs to development on environmentally  sensitive watershed land.” Add nonprofits to “Implementing Agencies and Partners.” Change “Support conservation easements...” bullet to add “, including recognition of reduced value of undevelopable land,”
34. An important recommendation across the entire district. Replace ~~Germantown~~ with District
35.  Add PECO, other agencies, nonprofits to “Implementing Agencies & Partners”
- NEW. Celebrate and help to retain healthy heritage trees and support planting of future heritage trees throughout the district.
36. **MAKE PRIORITY!** *Change language to:* “Create regulatory, financial, and other incentives for reuse of historic properties. Encourage ~~Allow~~ a wider range of uses, additional housing units, and relaxed ~~size~~ dimensional requirements for properties listed.. .” Add nonprofits to “Implementing Agencies & Partners”
37. Add Nonprofits and City Council to “Implementing Agencies & Partners”
38. Add bullet point: “adopt local financial and dimensional incentives that support current federal, state and other existing incentives”
39. –
- NEW. Utilize and support other tools to protect significant resources including conservation districts (in conjunction with preservation of individual resources), demolition moratorium, preservation easements, or (if created)

CH Conservancy Comments to the Upper NW District Plan Final Draft

preservation districts.

- 40. –
- 41. Add language: public art, plantings, lighting... . *Add bullet points for:*
Northwestern & Germantown Avenues, and Bethlehem & Stenton Avenues
- NEW. Make active use of the Neighborhood Conservation District Overlay tool, in
conjunction with efforts to protect individual historic buildings, to promote
urban design objectives in residential neighborhoods.

Comments on PROPOSED ZONING, page 86

CORRECTIVE ZONING

| | Existing Zoning | Proposed Rezoning | Reason for Rezoning |
|---|-----------------|-------------------|---|
| A | | | <u>In Growth and Infill areas,</u> replace multi-family zoning districts with single-family districts where single family homes are the predominant housing type |

ZONING TO ADVANCE THE PLAN

| | Existing Zoning | Proposed Rezoning | Reason for Rezoning |
|---|-----------------|-------------------|---|
| J | | | <i>Add language:</i> Promote housing production <u>through both</u> <u>adaptive reuse and new</u> <u>construction</u> on major corridors and close to transit stops |

| | | | |
|-----|---------|-------|---|
| NEW | RSD-1-3 | RSD-C | Limit subdivision with a new large-lot zoning district where development would do environmental harm and would not help to achieve equitable development |
|-----|---------|-------|---|

PROPOSED ZONING MAP

The first block of W. Chestnut Hill Ave at Germantown Avenue should be zoned lower, not higher, as it remains historic and residential in use and character.

MEMORANDUM

To: Philadelphia City Planning Commission
From: Chestnut Hill Community Association, Chestnut Hill Conservancy, Chestnut Hill Business Association, Friends of the Wissahickon
CC: Cindy Bass, District 8 Councilwoman
Date: September 21, 2018
Re: Upper Northwest District Plan Recommendations from Chestnut Hill RCO and Stakeholder Organizations

On behalf of the Chestnut Hill Community, we thank all involved in the development of the Upper Northwest District Plan. We greatly appreciate the level of thought and the many hours that went into the plan and are also very appreciative of the Planning Commission's commitment to having public input shape the district plans that are part of Philadelphia2035.

On July 17th the final draft of the Upper Northwest District Plan was released for review and comment by the community. Through much of the rest of the summer, stakeholders from the Chestnut Hill Community Association, the Chestnut Hill Conservancy, the Chestnut Hill Business District, and the Friends of the Wissahickon met to review and discuss the plan. Several public meetings were held to get input and discuss recommendations for changes and additions to the plan. While all organizations involved are in support of each other's recommendations with no disagreement, each organization acknowledges that some requests for changes and additions to the plan are more applicable to the mission of one organization versus another and therefore each organization has submitted a memo to the Planning Commission with their own recommendations.

However, throughout the process it became very clear that there are several recommendations for changes or additions to the plan that all the Chestnut Hill organizations involved felt are extremely important. Below are these recommendations for inclusion or change in the plan. Detail regarding these recommendations can be found in the attached memos.

- **Support the careful and consistent up-zoning of properties fronting Germantown Avenue and Bethlehem Pike to CMX-2 status.** – *add to HOUSING recommendations on page 32*
- **Create a new RSD-C zoning category covering appropriately identified residentially-zoned properties larger than one half acre and poorly served by infrastructure and/or in environmentally-sensitive areas, and limit future subdivisions of these properties to no less than 20,000 square feet.** - *Related to current Recommendations 7 and 33, should be elevated to Priority Recommendations, with additional mention of environmental sensitivity. Could be added to HOUSING recommendations on page 32*
- **Creation of Neighborhood Conservation Overlay (NCO) zones.** – *this item builds on the PCPC's NCO regulatory vehicle, which is currently underutilized and can be added to HOUSING recommendations on page 32*

- **Support appropriate rezoning of blocks around SEPTA Terminal regional rail stations in Chestnut Hill (upon consultation with Chestnut Hill's RCOs and other stakeholders) to permit more intensive residential development.** – *supports priority recommendation #5 on page 32*
- **Support the preservation of historic architecture in neighborhoods through individual designation, and the use and expansion of special thematic preservation districts. The Chestnut Hill community believes that the designation of such districts should be accompanied by appropriate regulatory, financial, and other incentives.** – *Should be added to current recommendation #36 and elevated to a Priority Recommendation, with a broader list of possible incentive categories.*
- **Support the expansion of Recommendation #22 (page 42): We believe that the entire Upper Northwest District would greatly benefit from a comprehensive street safety and walkability study and subsequent implementation plan.**
- **Include investment in streetscape and public infrastructure improvements along Chestnut Hill's commercial corridors, prioritizing needed pedestrian lighting upgrades, crosswalk enhancements, and maintenance of historic paving materials.** – *add to the Neighborhood Centers section of "Thrive" or the Complete Streets section of "Connect".*

Again, thank you for the opportunity to ensure that the community members of Chestnut Hill have a voice in Phila2035 and please feel free to reach out to any of the memo's signers with questions. We all look forward to working with the PCPC as we go forward in implementing the Upper Northwest District Plan.

MEMORANDUM

To: Philadelphia City Planning Commission
From: Chestnut Hill Community Association Board of Directors and Land Use, Planning, and Zoning (LUPZ) Committee - see attached list for names
CC: Cindy Bass, District 8 Councilwoman
Date: September 21, 2018
Re: Upper Northwest District Plan Final Recommendations

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TOP FIVE RECOMMENDATIONS

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These include:
 - (i) reducing excessive storm water flows and pollutant runoff into Wissahickon Creek and its tributaries by reducing the amount of impervious surface;
 - (ii) reducing the burden on existing public, community, and environmental services in areas where providing those services is more costly;
 - (iii) preserving the current low- and medium-density character of stable and desirable neighborhoods with larger block areas;

(iv) discouraging unnecessary and undesirable speculative land subdivision; and,
(v) redirecting new multi-family and higher-density residential development closer to Germantown Avenue, where pedestrian and public services are more plentiful and efficiently provided. - *add to Housing recommendations on pg. 32.*

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ADDITIONAL RECOMMENDATIONS

6. Conservation: Enlarge the existing Germantown Avenue Overlay Zone to include interior parcels and a requirement that requests for demolition permits be accompanied by a submitted reuse plan. The purpose of this effort is to prevent property owner from demolishing properties to speculatively land bank them.
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Jean Wedgwood
Bradley Wells

Members - Land Use, Planning, and Zoning Committee

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Steve Gendler
Lawrence Goldfarb
John Landis
Joyce Lenhardt
Laura Lucas
Jean McCoubrey
Larry McEwen
Ned Mitinger
Andrew Moroz
Bradley Wells



September 17, 2018

Ian Hegarty
Upper North & Upper Northwest Community Planner
Philadelphia City Planning Commission
One Parkway Building
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Dear Mr. Hegarty,

Enclosed, please find the final comments of the Chestnut Hill Business District on the Philadelphia City Planning Commission's Draft of the Upper Northwest District Plan. These comments have been reviewed and approved by the Board of Directors of the Chestnut Hill Business Improvement District (CHBID), the Board of Directors of the Chestnut Hill Community Development Corporation (CHCDC), and the Board of Trustees of the Chestnut Hill Business Association (CHBA). As part of our stakeholder outreach process, the plan website, information on proposed zoning changes, and our proposed priority issues were shared with the full membership of the CHBA and mailed in hard-copy form to all property owners in the CHBID. Stakeholders were provided with one month to share feedback before these comments were finalized and sent to our board of directors. As a result, I feel confident that these comments are reflective of the priorities of Chestnut Hill's business community.

Thank you for your work on the preparation and refinement of this important District Plan. We look forward to reviewing the final approved document and working with your office on advancing its implementation in our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Dawson". The signature is stylized with a large, looping "P" and a cursive "Dawson".

Philip Dawson
Executive Director
Chestnut Hill Business District

8514 Germantown Avenue
Philadelphia, PA 19118
215-247-6696
pdawson@chestnuthillpa.com



Chestnut Hill Business District: Final Comments on PCPC Draft Upper Northwest District Plan

Top Priorities

- **Streetscape** | The Business District believes that the Plan must advocate for needed streetscape infrastructure renewal in Chestnut Hill, prioritizing lighting, crosswalks, and maintenance of historic paving materials. This infrastructure has been demonstrated to be in a state of disrepair, constituting a hazard to both drivers and pedestrians, and its replacement is not adequately funded. In addition, the intersections of Bethlehem Pike & Stenton Avenue and Germantown & Northwestern Avenues should be added to the list of proposed local gateways slated for improvements.
- **Zoning** | The Business District supports the concept of focusing growth around Chestnut Hill's commercial corridors through corrective zoning and up-zoning. Property owner feedback has been supportive of rezoning CMX-1 properties to CMX-2 and CMX-2.5; however, proposed applications of CMX-2.5 zoning should be judiciously limited to areas with special potential for redevelopment. In addition, the Business District is supportive of growth in the small commercial node near the Chestnut Hill East station, and advocates for investment in public water infrastructure in this area to support it.
- **Public Transportation** | The Business District supports the proposed public transit improvements to reconstruct Bethlehem Pike bus loop, consolidate bus stops, and add transit shelters in Chestnut Hill. The District supports reassessing optimal bus routing through the neighborhood in order to improve roadway safety, and providing for maintenance of former trolley infrastructure to improve roadway conditions and potentially facilitate the activation of a limited-service, heritage streetcar line to stimulate tourism.
- **Historic Preservation** | In order to protect the integrity of historic buildings and safeguard Chestnut Hill's competitive advantage as a destination, the Business District supports putting historic protections in place in advance of planned rezonings. The District supports surveying historic properties, creating improved financial and regulatory incentives for adaptive reuse, and increasing protections through local designation and/or a historic district.
- **Green Space** | The Business District supports enhancing green space and connections to recreation through completion of the Cresheim Valley Trail, allocating additional resources to tree planting and care, and better maintaining pedestrian and vehicular connections to the Wissahickon.

Detailed Comments

Page 10, Historic Street Paving Thematic District: The existence of this thematic district is a good start, but more deliberate action and changes to prevailing work practices are needed in order to preserve these historic thoroughfares. Given the concentration of well-preserved historic streets in the Upper Northwest, the City should implement policies that are conducive to the proper maintenance and restoration of the historic paving materials. Currently, roadway patches and excavations by public utilities are often performed using a “one size fits all approach” with tar and asphalt, rather than replacing the historic paving material. As a result, the functional and visual integrity of historic streets is often progressively damaged, and secondary repairs must be scheduled on a future date to reconstruct the patched area, if they are ever scheduled at all. A better approach would be to require the City of Philadelphia’s Streets Department and PennDOT to deploy dedicated units within their roadway maintenance crews who are skilled in the repair of historic paving materials to make proper repairs on damaged streets when needed. Public utilities and private contractors who perform excavations in historically-paved streets should likewise be required to properly replace the historic pavers they remove. This could be facilitated by providing special certifications to paving contractors and requiring that one of these be used to perform the repairs, and/or by offering the option of paying an additional fee to the city/state so that their respective special roadway maintenance units could perform the work.

Pages 22-23, Neighborhood Centers: This section of the plan should include mention of Chestnut Hill as a destination commercial corridor in Northwest Philadelphia, as the neighborhood contains over 175 small businesses and receives over 310,000 visitors per year.

Pages 30-33, Thrive Recommendations:

- **(Neighborhood Centers) Priority Recommendation 1:** While there is a legitimate need to prioritize coordinated planning strategies and investment of public dollars in commercial corridors in economically-depressed areas of the Upper Northwest District, this recommendation fails to acknowledge a number of pressing infrastructure needs in Chestnut Hill’s Germantown Avenue business district. Specifically, there is an urgent need for comprehensive pedestrian lighting renewal in the business district, where old fixtures have begun to lean and break, and where independent expert surveys have found inadequate nighttime illumination levels. Additionally, there is a need to replace many deteriorated areas of the Germantown Avenue roadway, including restoration of missing/damaged Belgian block and replacement of cement paving in crosswalks and around trolley tracks. While lighting improvements are partially funded, there is currently no funding allocated for the necessary street improvements in this area. Allocating sufficient resources to these projects is critical to the safety of drivers and pedestrians in this part of the city, and maintains the appeal of a historic commercial corridor which is an important economic engine for the city. Finally, the Implementing Agencies and Partners section of this recommendation should note PennDOT as a relevant entity, given that the state has jurisdiction over Germantown Avenue in much of the district.
- **(Housing) Priority Recommendation 5:** The Housing and Commercial Development Strategy articulated here and on Pages 26-27 seems sensible and in the best interest of Chestnut Hill. With its walkable downtown, commercial amenities, and good transportation access, the

Chestnut Hill Business District can accommodate growth in accordance with zoning regulations and a strong ethic of historic preservation.

Pages 30-33, Connect Recommendations:

- **(Transit) Priority Recommendation 14:** The Chestnut Hill Business District generally supports these recommendations to enhance service and transit facilities along the Route 23. Consolidation of stops would improve trip times while adding additional street parking in the district due to the removal of some bus zones. While more information is needed regarding the proposal to reconstruct the bus loop at Germantown Avenue and Bethlehem Pike, such a project could improve deteriorated passenger facilities there and remove obsolete infrastructure that presents ongoing safety concerns.
- **(Transit) Recommendation 15:** The Chestnut Hill Business District supports both of these proposals for increasing transit ridership on these rail lines, making it easier for residents, workers, and visitors to access Chestnut Hill.
- **Additional Proposed Recommendation (Transit/Complete Streets):** The draft plan makes prominent mention of Germantown Avenue and its heavily-used Route 23 bus, but the need for planning around the future of the route's former trolley infrastructure is conspicuously absent from the document. Deteriorating tracks and paving, old catenary poles, and miles of electrified catenary are significant elements of the Germantown Avenue streetscape throughout the entire district. In the short term, most are in need of significant maintenance, and some pose safety concerns for drivers, pedestrians, and cyclists, but there is not currently sufficient funding allocated for proper upkeep by SEPTA. This plan would be an apt place to make recommendations about the future of this trolley infrastructure in concert with SEPTA long-range planning staff, given that it has now been out of use for over 20 years. As a result of funding limitations/priorities, SEPTA's long-term interest in moving towards a fleet of articulated LRVs, and the segmentation of the original 23 bus route, it now seems highly unlikely that a complete restoration of commuter trolley service on this line would be feasible in the foreseeable future. Given this reality, and the fact that the track infrastructure is in a state of poor repair in much of the district, there should be adequate planning for maintenance/renewal of the trolley infrastructure going forward. As SEPTA replaces its legacy PCC fleet with new LRVs in coming years, such maintenance could facilitate the potential reuse of the line as a limited-operation heritage streetcar route, which could drive tourism and business to the Upper Northwest.
- **(Complete Streets) Recommendation 20:** The Chestnut Hill Business District supports this recommendation to close sidewalk gaps between neighborhoods and parks/recreation centers. Given the district's proximity to the Wissahickon, this strategy would make it easier for recreational visitors to reach the commercial corridor.
- **(Complete Streets) Recommendation 22:** The Chestnut Hill Business District is pleased with the inclusion of Springfield Avenue on this list for crosswalk enhancements. However, a more thorough evaluation of Chestnut Hill's cross streets should be undertaken in order to identify other streets which meet the stated guidelines. While Springfield Avenue is a disjointed intersection which is in need of improvements, other streets which cross Germantown Avenue

between the 7900 and 8600 blocks more closely match the given standards for higher retail density, higher pedestrian volumes, and crosswalks in a state of disrepair, so these should be added for consideration.

- **(Utilities) Recommendation 26:** The Chestnut Hill Business District would be supportive of this proposal, provided that proper restoration of the street and sidewalk infrastructure is undertaken, and provided that good communication and timeline management are in place to minimize disruption to small businesses.
- **Additional Proposed Recommendation (Utilities):** As utilities investments are considered, the city should pay special attention to areas which lack public water/sewer service, yet are located within the areas that the plan designates for growth or infill development. These areas, such as the zone in the vicinity of the Chestnut Hill East regional rail station, would benefit from an investment in utilities infrastructure in order to support the desired growth.

Pages 56-59, Renew Recommendations:

- **(Open Space) Recommendation 28:** The Chestnut Hill Business District fully supports this recommendation to complete the Cresheim Trail, which would strengthen the only direct connection between the Wissahickon trails and the Germantown Avenue commercial corridor.
- **(Tree Cover) Recommendation 35:** Planting additional trees is a good recommendation, but it should be undergirded with a recommendation that the City provide increased funding for pruning of existing trees and removal of dead trees. Although the city has jurisdiction over all street trees, years of insufficient funding for this program have left a 2-3 year wait for dead tree removal, and a 6-8 year wait for street tree pruning. Without proper funding, this ambitious program may not be sustainable, especially in lower income neighborhoods in the Upper Northwest where residents may lack the means to provide ongoing tree care.
- **(Historic Preservation) Recommendations 36-39:** The Chestnut Hill Business District is supportive of efforts to survey historic properties, create improved incentives for their reuse, and identify new funding sources for reuse. The Business District is supportive of the proposal to create a local historic district along Germantown Avenue in order to better protect historic properties and safeguard the unique character of the business district, which provides a critical competitive advantage over other nearby shopping destinations.
- **(Public Realm) Recommendation 41:** The Chestnut Hill Business District is supportive of the proposed gateway improvements at the Cresheim Trail and Germantown Ave/Bethlehem Pike areas in concept, provided that there are engagement processes which allow local stakeholders to such as the Business District to help guide design, planning, and implementation. In addition, the intersections of Bethlehem Pike & Stenton Avenue and Germantown & Northwestern Avenues should be added to the list of proposed local gateways slated for improvements.

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Bradley Wells



West Central Germantown Neighbors, protecting the Tulpehocken Station Historic District
Zoning and Land Use Committee, A. Luke Smith, Chair

Email: a.lukesmith@gmail.com

Friday, September 21, 2018

[Via email to ian.hegarty@phila.gov]

Ian Hegarty
Upper North and Northwest Community Planner
Department of Planning and Development
Philadelphia City Planning Commission
One Parkway Building, 1515 Arch St, 13th Floor
Philadelphia, PA, 19102

Dear Ian:

I write on behalf of West Central Germantown Neighbors Zoning and Land Use Committee (“WCGN”), a designated RCO covering some five hundred households in the area bounded by West Washington Lane, Germantown Avenue, Cheltenham Avenue, and SEPTA’s Chestnut Hill West rail line. The Zoning Committee reviewed the Upper Northwest Draft District Plan and has the following comments for WCGN’s geographic area.

Non-Zoning

- **Wissahickon Access:** Access to the Wissahickon is very poor, with most people entering through Rittenhouse Town on Lincoln Drive. There is no obvious public transportation option from Downtown, leaving the Wissahickon accessible only to people with a vehicle.
Suggestion: A footpath from Tulpehocken Station through the woods and a pedestrian bridge across Lincoln Drive, allowing direct access to Rittenhouse Town. This effort can combine with the work already taking place on Lincoln Drive.
- **Greene and Cheltenham Plaza:** We support the proposed project at the Greene and Cheltenham Plaza. The project should be accompanied with long term planning/funding for cleanup and maintenance.
- **The plan makes no mention of improving accessibility to SEPTA's Cheltenham Avenue station.** Consider installing an elevator to the street.
- **Carriage Houses and In-Law Suites:** We support accessory dwellings and in-law suites so long as there is a way to ensure owner occupancy.



West Central Germantown Neighbors, protecting the Tulpehocken Station Historic District
Zoning and Land Use Committee, A. Luke Smith, Chair

Email: a.lukesmith@gmail.com

- Complete Streets: In addition to sidewalks and bike lanes, we would like to see matching historic pedestrian lighting added.

Zoning

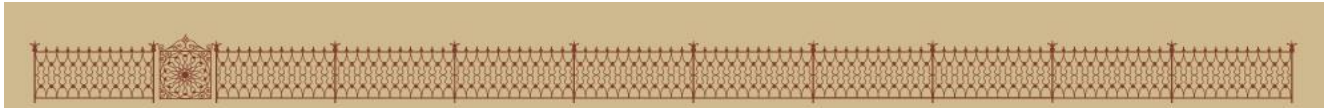
- WCGN does *not* support any change from single family (RSA) to multi-family (RM) on residential blocks. For example, proposed changes on the NW side of Tulpehocken between Greene and Wayne. If requested, this should be done through a variance process with neighborhood input.
- WCGN supports all up-zoning on Cheltenham Avenue (CMX3) to support mixed use development, such as the concept development for the Burger King / Dunkin Donuts lot on page 50, 67 of the Draft Plan.
- On Germantown Avenue, WCGN recommends that any zoning changes consider the historic nature of the buildings. We do not want re-zoning to incentivize the demolition of historic structures for new construction. The proposed zoning change, to CMX2.5, will allow five story buildings by right, creating this incentive. We propose a Germantown Avenue Thematic Historic District, in line with what is being considered by the Philadelphia Historical Commission on Ridge Avenue in Roxborough. We feel this would protect our historic buildings but allow for consistent commercial uses on Germantown Avenue.

Respectfully submitted,

**WCGN, Zoning and Land Use Cmte.
(Local RCO)**

By: _____

A. Luke Smith, V.P. and Committee Chair
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West Central Germantown Neighbors, protecting the Tulpehocken Station Historic District
Zoning and Land Use Committee, A. Luke Smith, Chair

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angela.bowie@phila.gov
WCGN zoning committee