

Master Plan for the Central Delaware

Public Comment Summary

DRWC received approximately 140 comments on the Master Plan between the unveiling event on June 13 and the close of the public comment period on August 26. Thirty-three of these comments were received between June 13 and July 25, when the full version of the report was released by the DRWC. These comments were therefore made based on the Summary Report draft document, which was a preliminary executive summary of the full report document released on June 13. Many of the comments received during this time were addressed in the full report, and no further action was necessary.

In many cases, DRWC was able to make changes to the text of the final report to incorporate the suggestions of commentators. However, DRWC was unable to address all the comments and suggestions for various reasons, ranging from comments being made on details that will be addressed at a later stage when park and development projects are individually developed to comments being made on elements of the plan that are not under DRWC control such as comments for SEPTA or DRPA or comments for the City Planning Commission on zoning recommendations.

This spreadsheet contains detailed responses for each comment that was made during the public comment period, and provides a numbered code for the disposition of the comment as follows:

1. These comments were positive comments on the plan and need no response.
2. These comments have been addressed by actions taken outside of the master plan.
3. These comments were good comments, and changes were made in the plan accordingly.
4. Comments in this category usually pertain to details that will be addressed during the project development phase of specific projects, and were too detailed in nature to be incorporated into the final plan.
5. These comments were good comments but pertained to items or issues that are not under DRWC jurisdiction, therefore changes were not made in the plan. These comments were for either sites outside of the geographical scope of the plan, or pertained to agencies outside of DRWC such as SEPTA or DRPA, or the comments addressed items such as programming, that were briefly mentioned in the plan, but were not the primary focus of this study. In most cases DRWC could advocate to other agencies for action on these comments.
6. These comments pertained to items that were outside of the scope of the plan, and with which DRWC does not concur, and will therefore not advocate.
7. In this category of comment, DRWC believes that there was a misreading of the intentions of the plan. In some cases, these comments were made before the final report was released, and clarifying text had already been included in the final report. In other cases, the final report was edited to clarify intentions and reduce the amount of confusion on certain topics. In other cases, DRWC did not concur with the comment and did not make changes in the final report, as described in the disposition description.
8. These comments were considered, but DRWC either does not concur with the comment or the comment was not feasible to incorporate for the project area.

The following brief summary of the comments provides clarification on some issues that commenters brought up repeatedly:

Public Realm

- **Park Implementation**

Numerous comments were made that made specific recommendations for park details such as types of planting, ratios of hard to softscape, amenities such as restrooms, dog parks, playgrounds, etc. These comments are all great suggestions, but as a master plan document, decisions on exact park design and amenities were not included. These decisions will be made as each individual park is designed and implemented, and all of these types of projects will include a public input process.

- **River's Edge Condition and Setback**

Several comments questioned the recommendations for the river's edge. The plan makes very careful recommendations on places where bulkheads, piers, or other edges of the waterfront should be changed from the current condition. These decisions were based on studies by other agencies that indicate the best places to restore/enhance wetland conditions as well as cost considerations. Likewise, the proposed 50-foot building setback was proposed to create adequate space for recreation activity but keep development close enough to the river's edge to provide an active frontage on the river. Setbacks of more than 50 feet were suggested based on thoughtful analysis of where a larger setback would provide increased benefit of some sort, whether it be for recreation, habitat, or aesthetics.

- **Existing Waterfront Parks**

There were numerous comments on improvements to two existing parks (Pulaski and Penn Treaty) that are owned, maintained, and programmed by the Philadelphia Department of Parks and Recreation. The master plan supports the City's plans to make improvements to both of these parks, including capital improvements to Pulaski and implementation of the newly-completed master plan for Penn Treaty Park. Questions were also received on the expansion of Pulaski Park, which is located in an extremely constrained area of port and heavy industrial activity. Expansion to the south is absolutely expressed as a goal in the Public Realm Plan; however this is included in the "Extended" Public Realm Plan, meaning that it is a very long-term improvement and is anticipated to be outside the 25-year timeframe of the plan. This decision was made based on the desires of the current owners (Conrail) to maintain this area for heavy industrial, rail-served uses.

Waterfront Activation

- **Active Recreation**

Of the many comments received by DRWC related to the activation of the waterfront, quite a few were suggestions for specific programming at waterfront parks, such as dog parks, swimming pools, playing fields, and spaces devoted to children's recreation and education. These sorts of programming decisions will be made at later stages in the development of particular sites, but have been taken into consideration. General recommendations have been made in the Park Design Guidelines section about areas where certain types of activities would be appropriate and encouraged.

- **Fishing**

Fishing is currently allowed and encouraged at Pulaski and Penn Treaty Parks and Washington Avenue Green. Additional fishing facilities are planned for the pier at Dickinson Park in the southern part of the waterfront.

- **Historic Ships on the Waterfront**

Several questions were received about the future of large historic ships like the S.S. United States and the U.S.S. Olympia. DRWC embraces the maritime history of the region; however all of the large, historic ships currently located on the waterfront are owned and/or controlled by other organizations. The S.S. United States is owned by a conservancy which is currently exploring future reuse options, and the Independence Seaport Museum has decided to divest itself of the Olympia and the Becuna. The relocation of the Olympia and Becuna from their current site in the Penn's Landing basin is key to the successful redevelopment of this area. DRWC does hope that all of these vessels will eventually be in the hands of financially-sound organizations dedicated to their preservation, and DRWC would work with these groups to find suitable locations on the waterfront should they stay in Philadelphia.

- **Amenities for Recreational Boating**

There were numerous questions about enhancing facilities for recreational boating on the waterfront. In addition to the existing powerboat marinas on the waterfront (at Penn's Landing Basin and the Philadelphia Marine Center located at Piers 12-29 north), the Plan shows a future marina at Washington Avenue Park as well as transient boat slips near Penn Treaty Park and Berks Park. These slips will provide places for boaters to dock while enjoying the new retail and cultural amenities along the waterfront.

- **Programming and Cultural Institutions**

This plan is primarily a land use and planning document; therefore basic programming recommendations were made in the Design Guidelines section of the Public Realm chapter as well as the Waterfront Activation section. However, specific ideas for programming could be implemented by either DRWC's programming staff, which is exploring various new ideas for programming and arts on the waterfront, or other institutions and city-wide organizations with a focus on programming. Additionally, cultural destinations are very important for an active waterfront, but again as a land use and planning document, this document could not create new cultural institutions. The plan, however, has created a framework in which cultural organizations could thrive by planning for potential new locations for institutions (Delaware Generating Station/PECO) and increased activity near existing institutions like the Seaport Museum.

Transportation

- **Delaware Avenue Transit**

The proposed light rail/streetcar system along Columbus Boulevard/Delaware Avenue will eventually be developed by agencies other than the DRWC. This project is still in the very early stages of planning, and its ultimate geographic extent has not been determined. For the purposes of the master plan, DRWC has depicted it extending between Mifflin Street in the South and Frankford Avenue and Girard Avenue in the North. DRWC does endorse making the connection to Market Street using Dock Street and Front Street (and the map has been amended to reflect this) and will advocate for the rail system to be implemented in the future.

- **Trail and Bicycle Connections**

There were several comments on connections to existing and planned bicycle and trail facilities. DRWC is committed to ensuring that the multi-use trail connects to other existing and proposed trails so that it is a part of complete regional trail network. These include connections to the Spruce and Pine bike lanes, the North Delaware Greenway trail in Northeast Philadelphia, and the section of the East Coast Greenway that runs along Spring Garden Street, which the Pennsylvania Environmental Council is developing to provide a crucial east-west connection across the city. The final plan has been refined to be sure these goals are clearly stated.

- **I-95**

Questions were received on the efforts that are recommended to mitigate its negative impact and reduce the noise from the highway through design and materials. Given current and

anticipated market conditions, burying and covering the entirety of I-95 is not economically feasible in the next 25 years. However, the master plan absolutely recognizes the impediment the highway creates to effectively connecting neighborhoods and the city as a whole to the Delaware waterfront, so numerous improvements are planned such as capping over a block of the interstate between Chestnut and Walnut Streets and extensive, high-impact improvements to the connector streets. See pages 143-153 for a more detailed discussion of plans for I-95 and the connector street initiative.

Land Use and Zoning

- **Density and Building Height**

Density on the waterfront has been recommended based on projections completed by the Planning Commission in the Philadelphia 2035 plan. It is possible that Philadelphia could grow more rapidly than what is projected in this city-wide plan; however, for the purposes of the master plan, the team did not think it wise to over-estimate the absorption potential (and therefore the density shown in the plan). Consequently the plan does recommend a mid-rise height limit for the entire waterfront, with certain areas recommended as low-rise. The final plan has also been edited to more clearly provide criteria under which height may be appropriate on the waterfront. Recommendations in the master plan are preliminary recommendations; the Planning Commission and City Council will have to make the final decision on height and density as they consider and adopt zoning policy for the waterfront.

Master Plan for the Central Delaware

DRWC Response to Public Comments

RESPONSE CODES

- | | |
|---|---|
| <ul style="list-style-type: none"> 1- Positive comment; no response required. 2- Action already taken outside of master plan. 3- Good comment; changes made in final plan. 4- Good comment, but will be addressed during project development phase therefore not included in master plan. 5- DRWC concurs with comment, but issue is not under DRWC jurisdiction. In some cases DRWC could advocate with other agencies. | <ul style="list-style-type: none"> 6- Comment is outside of the scope of the plan. DRWC does not concur, and will not advocate. 7- Misreading of the draft plan. In some cases final plan has been altered to be more clear about intentions. In other cases DRWC did not concur and did not make changes in the final report. 8- Considered, but not feasible for project area. |
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PUBLIC REALM COMMENTS

	Comment	Response Code	Response Explanation
1	Why not put bridges over the river inlets, adjacent to the river (at pier tips)?	4	Bridges are very expensive and require an extensive permitting process; therefore, they may be unfeasible. However, they will certainly be considered in appropriate locations as determined during individual project development phases.
2	Has the Marcellus Shale natural gas reserve been considered in the plan? Fracking interests will poison the Delaware. Will we regret poisoning the very waterfront we are trying to bring back to life in Philadelphia?	8	This comment is outside of the scope of the master plan. Other agencies besides DRWC regulate gas drilling in Pennsylvania.
3	"patch of land ...eastern end of the viaduct...rich habitat, perhaps even being attractive to the American Bald Eagle.... opposite Petty's Island, a site that will be transformed into a nature preserve." -AWESOME glad to see so much attention to and planning for wetlands, obviously important, and to access to parks and walking radii. "industrial history ...structures from the industrial past such as an ore loading structure ... will be preserved." - GREAT "open viewsheds...ensures ... recognizes the close proximity of riverfront" - GREAT "Community Gardens"; good, but I would like to advise (as an MLA (landscape architecture) that in the designs be included space for native fruit trees nearby as permanent features in the design which also provide seasonal fruit; the urban farming initiative is one key to true well-rounded sustainability	1 / 4	Specific details of park design will be determined as each park is developed, and will include a public process.
4	Will there be any dog parks for our 4 legged friends to run and play without a leash?	4	We received numerous comments about dog parks at various public meetings. Specific details of park design will be determined as each park is developed, and will include a public process.

5	Could you please set a system of calling the piers by their street names? People do not know the pier numbers. (i.e. Race Street Pier!)	3	Yes, we have instituted a naming system for the new parks shown in the plan that corresponds with the streets rather than the pier numbers. However, there are many piers that fall between streets and it will be difficult to do this in all cases.
6	Similar to the streets, it would be helpful if the piers were numbered on the plan graphics to match the text. For example, it would be helpful if Piers 53 & 72 were labeled on the graphic adjacent to page 37 (page number in original draft).	4	Great comment; however in order to keep the graphic clean and readable, we did not label the piers on the illustrative plan. We will consider this in the future for all graphic images.
7	It does clear how the Master Plan intends to treat the various degraded piers in the study area. It is not clear whether the \$39 million cost indicated on Page 185 (page number in original draft) is for the cost of removing degraded structures that are otherwise the responsibility of private landowners. If the planners believe that the piers are inappropriate and should be removed, I urge consultation with appropriate legal resources and personnel, including state and federal environmental agencies, to force the removal of these structures by the property owner at his or her own cost. Public dollars should only be used as a last resort.	7 / 4	The Public Realm Plan clearly denotes which piers should have public access and which should not as well as indicating very specific locations where piers have collapsed into the river and should be utilized for habitat rather than public access. Many of these are privately owned and their disposition will be determined on a case by case basis with individual property owners.
8	We applaud the Delaware River Waterfront Corporation for taking on the task of revisiting planning for the central Delaware River waterfront. By its Plan, the DRWC has formulated broad outlines for exciting projects and interesting projections for the growth of this area, including the notion that targeted public investments in public lands and City infrastructure will multiply private investment on the waterfront.	1	
9	Excessive public realm: The Plan recommendations suggest excessive additions to the public realm with major implications specific to each of the privately held Anderson properties. We question the need for both Berks Park and Cumberland Park and the proximity of Berks Park to Penn Treaty Park. Other examples are the setbacks for commercially zoned properties, the private obligation to create public trails and access roads and the idea (unsupported by engineering studies on cost/benefit analysis) of removing the existing piers. DRWC does not offer its opinion on how these areas will be acquired, maintained, secured and insured.	7	DRWC does not concur that the public realm in the plan is excessive. The public realm was carefully planned and balanced to be the proper amount of open space as well as development sites. Language in the plan clarifies that acquisition of land for public use should be done according to applicable law. The plan only recommends removing piers in very limited locations to support wetlands creation.
10	Concerned that there was "Photo shop planning" of park and undefined public venues without any feasibility analysis.	8	The process for the plan was to complete an intensive analysis prior to any artistic renderings being completed for the project area. Therefore the rendered images are based on extensive analysis and planning by the planning team.

11	<p>Great resource for parks, waterfronts & public space inspiration: http://www.pps.org/waterfronts Perhaps adding the Philly Master Plan could generate exposure & secure more funding? Interesting story in the NY Times re: successful & rapid redevelopment of Madrid's riverfront: http://travel.nytimes.com/2011/07/10/travel/recreation-on-madrid-waterfront-heads-up.html I understand redevelopment will take a long time, so I was surprised to see Madrid designed & implemented an entirely revamped 4-mile span (including tunneling a 6-8 lane highway) in under 10 years! Many thanks for engaging the public in this exciting process and I look forward to seeing it come to fruition!</p>	1	Thank you for the resources.
12	<p>I like the new master plan; it addresses what the city of Philadelphia desperately needs: a working waterfront. The big ideas - paths, transit, enhanced connection to the city, and public/private development will work very well. I have two recommendations. One is build a proper bulkhead along the water edge for the 5 miles of the project. Your renderings show a weedy, reedy water edge with wood boardwalks. I think this strategy is based on an idea of 'sustainability' - that we must treat the river gently and allow the plants to grow etc. It's a bit of a fad and I think this kind of edge will not work well in the long term. And really isn't any more sustainable than building a proper bulkhead. In a sense it's an image of sustainability. My second recommendation is to increase the ratio of small towers to townhouses. Believe that 21st century Philly will grow past cottages. Congratulations and good luck from a resident of Philadelphia.</p>	1 / 8	<p>Urbanized, hard edges do not provide the natural flood protection (and protection from the growing threat of sea level rise) that wetlands do. While the plan obviously accepts that some uses of an urban waterfront require a harder edge, port activity and the form of industrial use have shifted over the years, leaving opportunity to restore a more natural edge in locations where bulkheads and piers are no longer needed for river commerce. Locations for wetland creation in the plan were carefully chosen utilizing preliminary examination of bathymetric information and habitat zones identified by the Philadelphia Water Department (PWD) and the National Oceanographic and Atmospheric Agency (NOAA) and which therefore be suitable for wetlands creation.</p> <p>The market will eventually determine how much height the waterfront can absorb. Low- to mid-rise was recommended utilizing current waterfront absorption forecasts.</p>
13	<p>Absence of Engineering and Environmental Studies: The Plan calls for residential and retail uses as well as a transformation of lands for public recreation. The Plan does not inventory the environmental studies which are needed to determine whether the properties identified for these transformational uses are suited for those purposes. Studies will be required to address the impacts on the continued working port and, most importantly, the phased reconstruction of I-95 and the additional ramps to be bid shortly for the Girard Avenue Interchange project..</p>	7	<p>DRWC concurs that additional environmental and engineering study will be necessary as projects move through the design and development stages. As a master plan level of study, this plan did not complete or inventory environmental studies for private property, but did compile these reports for property under DRWC control and those which were publicly available. The plan does absolutely include consideration for the reconstruction of I-95, however. DRWC consulted closely with PennDOT and their consultant on the reconstruction, URS, during the entire planning process and the final plan reflects all of PennDOT's reconstruction plans for the area between Race Street and Allegheny Avenue. Additionally, DRWC consulted with the Philadelphia Regional Port Authority and has coordinated all expansion plans for the port with this plan.</p>

14	Washington Ave: Riverfront Drive should be eliminated. No new N/S road to parallel the river. This puts a zone with potential for calm wetland experience back on a road. E/W streets should dead end at the river easement. Only a pedestrian path should parallel the river here. 50' easement to a road is too narrow. Recommend elimination of River Drive and widened green easement for wetland experience. (or put this park on Festival Pier rather than developing that with housing) (37, 71, 78, 145, 157: page numbers in original draft)	8	The waterfront drive was designed to provide access to development as well as public access to the wetlands park in this location. It is not feasible for E/W streets to dead end at the river. The 50-foot setback here is recommended as a minimum and because of the irregular condition of the river's edge the setback will most likely exceed 50 feet. This area was specifically chosen for wetland because it has opportunity for habitat. The Festival Pier site is on concrete pier structure and there is very limited potential for wetland habitat creation.
15	Washington Ave: Washington Avenue pier park should not be 90% hardscape. It should be 10% hardscape.	4	Details of this park, as with all parks shown in the plan, will be determined as each park is developed and will include a public process.
16	Washington Ave: Destruction of Coast guard building for "natural wetland" seems incongruous and wasteful. (39: page number in original draft)	8	The Coast Guard has expressed that they do not have enough space at their current location and are exploring moving to another location. The proposed reuse for this site is a park with a public pavilion, not wetland.
17	There isn't "vitality" on South Street any longer - (the boat basin may cannibalize what's left). What about the residents of boat basin complaining about activity or noise outside on basin?	4	Many residents enjoy living in lively locations, and that demographic will be targeted with the residential development on the basin.
18	The walkway from Market to Penn's Landing, although elegant, seems narrow. Perhaps an opportunity for a truly unique/artfully designed thoroughfare? Not massive or weighty as this may obstruct bridge views from Market & Front.	7	DRWC concurs. The plan does propose an iconic bridge at this special location at the foot of Market Street.
19	If Penn's Landing's Great Plaza is not to be significantly changed until later in the plan, then can we (please) restore/refurbish the existing Great Plaza, which many believe is a wonderful and useful site if properly maintained and managed (e.g. don't block it off and let it decay)	2	DRWC has already completed some renovations of the Great Plaza (new stage in 2010, new landscaping and restroom improvements in 2011), and has plans for additional maintenance work in 2012. However, as this plaza will be eventually demolished, investments will be limited.
20	I like most of this plan, but I do have a big disagreement with the plan. The first is that I think it would be a mistake to replace the Great Plaza with a plain grass lawn. I think the Great Plaza is a well-planned venue for events and a lawn would be less functional for the many events that Penn's Landing is known for. There are already many plain grass lawns, along Front Street, that aren't getting enough use and, also, having a lawn as the focal point of Penn's Landing seems like an extremely unimaginative idea for the center of an urban waterfront. It would be better to renovate the Great Plaza and build a park over the highways (since the highways are already below grade, then a tunnel wouldn't be inappropriate there) and have new development on the current parking lots with a mix of retail, high-rise condos, and additional public spaces (including a wading pool/fountain that would be used as an ice skating rink in the winter).	7	The Great Plaza does not work well as a flexible event space. The new park is planned to be a much more flexible space, able to accommodate all of the events that currently take place at Penn's Landing in addition to many more types of events that DRWC cannot currently program because of the constrained site.

21	<p>Hi, I think the master plan is very good. I just wanted to voice concern that the new square planned at Penn's Landing between Chestnut and Walnut might become a vacant dead space. The public monument zones in the area are so unused. I think what makes a plaza, or a Philadelphia square successful is that it is fully ringed with housing/buildings which activate and put "eyes" in the park and make it safer. Because the water is on one side and the highway takes up much of the other sides, this isn't fully possible. However, I think a solid built edge where possible would strengthen the concept. Also, I think putting in playing fields for soccer, ultimate frisbee, etc would get people using the field. I realize it isn't really designed yet but the blank green appears a bit overwhelming. Best of luck with implementation of all the wonderful plans. The following are my specific comments for Penn's Landing:</p> <p>Should not be 100% hardscape, water's edge should be greened (101: page number in original draft)</p> <p>Object to retail strip facing river with hard sidewalk, water's edge should be greened and public (50, 54, 112: page numbers in original draft)</p> <p>Recommend uses to activate park over 95: soccer field? How avoid dead zone like memorial area (43, 103: page numbers in original draft)</p> <p>Recommend emphasis on physical activity, recreation, and connected path/park like many successful municipal riverfronts</p> <p>Multi-use path should dip down to river at Penn's Landing (72: page number in original draft)</p>	1 / 4 / 7	<p>The plan agrees that parks need development surrounding them. Therefore active edges are planned for the new park at Penn's Landing on Front, Walnut, and Chestnut Streets.</p> <p>Details of this park, such as amount of hardscape/softscape and programming, as with all parks shown in the plan, will be determined as each park is developed and will include a public process.</p> <p>The water's edge will have landscaping and be public, with active uses on the ground floor such as retail and restaurants.</p> <p>There will be multiple choices for people utilizing the multi-use path to get to/through the Penn's Landing area, including utilizing the path at the river's edge.</p>
22	<p>Comment from CDAG: Penn's Landing Boat Basin</p> <p>It is generally felt to be over-built and intensely commercialized</p> <p>The Boat Basin plan suffers from an overconcentration of built program to the detriment of accessibility and the natural beauty and draw of the waterfront. CDAG recommends a reduction in the density of structures programmed, and adjustments should be made to assure a greener area. CDAG appreciates the need to balance waterfront access and recreation on the one hand; on the other hand, development that will activate the area and generate much-needed revenue to invest in other projects along the Central Delaware. The current proposal for this area simply gets the balance wrong. The Boat Basin is the narrowest, most compressed part of the Central Delaware Waterfront and should not be overbuilt. CDAG recommends a reduction in the density of structures and increased greening.</p>	4	<p>The purpose for the basin is to be active and commercial in contrast to the park between Chestnut and Walnut, which will be more passive in nature.</p>
23	<p>Comment from CDAG: Penn's Landing Promenade</p> <p>This critical waterfront amenity should be greener and more user-friendly</p> <p>The current design featuring a hardscaped, largely unshaded waterfront edge of this landmark promenade does not take advantage its inherent benefits and features. CDAG recommends it be designed to be softer and greener along the water's edge, with the hardscaped edge on the street side.</p>	4	<p>Hardscape does not mean devoid of landscaping and trees. The promenade will be a very friendly place for pedestrians to stroll and sit.</p>

24	<p>Comment from CDAG: Market Street Ramp Repurposing the Market Street ramp would reduce cost and enhance use CDAG strongly agrees with the removal of the scissor ramps in the Market Street area. However, we feel it is unnecessary and unwise, both fiscally and programmatically, to rebuild the Market Street ramp itself as a narrow pedestrian walkway. The existing ramp serves as a street grid extension to the river. It offers tremendous potential as a ready-made linear park, pairing pedestrian river access with pedestrian-friendly destination uses such as street vending, farmers' markets, and small-scale performances.</p>	4	<p>The Market Street ramp is proposed to be reconfigured in order to create development parcels on the north side of Market Street between Front and Second, and restore a more pedestrian feel in this area. The only way to do this is to create a smaller-scale bridge.</p>
25	<p>Spring Garden: Easement dips below 50' – too narrow.</p>	4	<p>This site is envisioned to be an urban mixed-use development site with a large plaza. Therefore the open space is concentrated in the plaza, not on the river's edge.</p>
26	<p>How do the tall towers at Spring Garden relate to riparian line that is under the public realm? How about all the built out areas on piers?</p>	4	<p>Not sure the exact meaning of the question. The towers in the plan were placed at the end of the street, which is currently on pier structure. This site will need much more planning and engineering study before a final site plan is determined.</p>
27	<p>Renovations to Penn Treaty Park, via its Master Plan are very important to our neighborhood, we will need all interested parties to work together to make this happen.</p>	5	<p>DRWC concurs and will support Philadelphia Parks and Recreation in their plans for the park.</p>
28	<p>We are in total agreement of the adaptive reuse of the PECO power plant. This plant could become a meeting place for the community and a place where the beginning of history of Philadelphia can be told. There are many museums that tell Philadelphia's history from the Revolution on up, but there is no museums that share William Penn's Treaty with the Indians and how this country was started. There is no better place to have this happen than right next to Penn Treaty Park.</p>	1	
29	<p>How about including a replacement fishing pier similar to what once existed at Penn Treaty Park?</p>	4	<p>DRWC has received numerous requests for fishing facilities, and will explore developing a fishing pier in the future. Fishing is currently allowed and encouraged at Pulaski and Penn Treaty Parks and Washington Avenue Green. The plan shows potential fishing facilities at Dickinson Park.</p>
30	<p>We are very hopeful that the parks at Berks, Lehigh, and Cumberland can become a reality. We are especially excited about the Lehigh Avenue Park; we would like to see that expanded up into the Lehigh Viaduct. We believe that the Lehigh Viaduct would make a great rail to trails walkway that could connect into the Lehigh Park and from there onto the waterfront promenade. We also want to see the Pulaski Park plan completed so residents of the City of Philadelphia have another place to fish along the waterfront.</p>	7	<p>The extended version (25+ years) of the public realm plan shows a large park at the end of Lehigh Avenue connecting to a greenway along the viaduct. Pulaski Park is currently available for fishing, and DRWC supports the improvements that Philadelphia Parks and Recreation is making to this park.</p>

31	Land use recommendations for a 50 foot wide pedestrian-friendly environment with mixed-use development between existing industrial parcels (PECO on the south, Glasgow Corp. in between Berks and Dyott, and Conrail on the north). Here questions of both urban design and pedestrian safety come into question.	7	The public realm in this area is based on the assumption that these industrial uses will change over time. There is very limited current industrial use on the PECO site (see page 63). The plan shows future flex commercial/industrial use north of this area, which would be easily compatible with a waterfront trail, so no conflict is anticipated.
32	Pulaski Park has great wetland development opportunities - could the Master Plan make sure that the restoration you mentioned embraces that aspect as developed by the Peter Letz plan under Penn Praxis vision. There is the money for restoration. Could it be used to implement the onside plan? Please take care of that!	5	The land to the south of Pulaski Park is owned by Conrail and is currently used for heavy industrial purposes. The plan shows a long-term waterfront park in this area, but because of current uses, it may be beyond the 25-year timeframe of the plan.
33	At Pulaski park there is a PPA impound lot. DRWC needs to work with stakeholder to north (DRCC) to carve out more park-like space at Pulaski (which is so isolated and small) and move PPA out of this space where it adjoins Pulaski.	5	This space is actually owned by the Philadelphia Regional Port Authority, which leases the land to the PPA. As it is outside of DRWC's project area, DRWC will consult with the Delaware River City Corporation and the PRPA about potential for expansion of Pulaski Park.
34	Is there a plan to move some uses off the river that don't need riverfront access? Especially city owned parcels like the PPA impound lot in Northern area above Pulaski?	3 / 5	See above for discussion about Pulaski Park. The plan does, however, show numerous locations where existing uses that don't need waterfront access have been replaced.

WATERFRONT ACTIVATION COMMENTS

RESPONSE CODES

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|---|---|
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|---|---|

	Comment	Response Code	Response Explanation
	HISTORIC PRESERVATION		
1	Consideration should be given to designating the study area as a Historic District.	7	The entire area is not recommended as a historic district. See specific recommendations in the historic preservation and archaeology reports in the appendix.
2	Ferry Terminal – Would love to see a building echoing the history of the building once at the foot of Market. SF ferry building is a gem – a hub of activity for tourists & locals with food, entertainment, transportation all in a beautiful, historic setting.	4	
3	Where's your sense of history? There is no iconic, historic monument letting people know that Penn's Landing isn't just another park by a river. Why didn't you make the rehab of the great arch which now welcomes people to Penn's Landing an integral part of the plan? Is this not the perfect site for a state monument - a keystone state arch?	6	The structure built to support the tram between Philadelphia and Camden is shown as demolished in the plan as it would be out of scale and character with new development.
	ARTS AND CULTURE		
4	Though it's been really exciting reading about the plans for the waterfront, especially the plans for the bicycle and train network, I'd like to see more in place for both visual and performing arts (music, dance, theater, interdisciplinary). Philadelphia is after all known for its thriving arts and culture scene. I am working with the Philadelphia Live Arts Festival and Philly Fringe and I do know about the Former Pumping Station (140 North Columbus Boulevard) at the foot of Race Street Pier, so there will be that. I also know that improvements are planned for Penn's Landing and the concert venues. But what else is there?	5	This plan is a land use and planning document; therefore the focus was not on programming. DRWC's programming staff is exploring various new ideas for programming and arts on the waterfront.

5	<p>Cultural Destinations – Would be great to see more museums. A revitalized Seaport & other museums are great destinations. Too much residential without culture would be unfortunate.</p>	5	<p>Cultural destinations are very important for an active waterfront. This document is a land use and planning document, so cannot create new cultural institutions. However, it has created a framework in which cultural organizations could thrive by planning for potential new locations for institutions (Delaware Generating Station/PECO) and increased activity near existing institutions like the Seaport Museum.</p>
6	<p>I have reviewed the Master Plan of the Central Delaware with citizen’s eyes. First, I’ll say that I am incredibly excited for the future of Philadelphia’s waterfront. I’m writing you today to talk briefly about public sculpture along the waterfront and question how this fits into the Master Plan overall. I urge you to consider the possibility of creating a high caliber contemporary sculpture park, or at the very least, a curated selection of public art work, along the Delaware River waterfront. Philadelphia has more outdoor sculpture than any other American city and I think it is important that the city take hold of this fact and build upon the reputation that Philadelphia is a serious place to experience world-renowned art out in the open and a major player in the public art world.</p> <p>What other spaces exist for art amidst all this mixed-use development? A plan should be in place, stretching the entire development zone. I would argue that it should not happen piece by piece. If you are to install sculptural works throughout the new waterfront development region, someone should curate this project to create a unified space for public art. A significant series of sculpture works along the waterfront would only work to enhance the district as a major attraction not-to-be-missed by both visitors to our city and residents of Philadelphia.</p> <p>A selection of outdoor work also creates the opportunity for supplementary programs that can serve to teach the public more about the art and surroundings, such as interactive audio tours and multi-platform audio experiences (an example of this kind of effort is the Fairmount Park Art Association’s Museum Without Walls™: AUDIO project, which I handled the media campaign for).</p>	4 / 5	<p>The plans for public art are outlined in the Waterfront Activation section on pages 123-127.</p>
7	<p>Comment from Public Art Forum: Members of the Public art Forum expressed particular concern about the use of graffiti images as public art and the promotion of a “museum” of graffiti. We appreciate and support the impulse to involve communities in the creation of public art, as well as referencing existing assets and features of the communities. However, it has been our experience that communities typically don’t view graffiti as a community asset, and that graffiti cannot be contained to one area (117: page number in original draft).</p>	4	<p>There have been numerous examples of successful graffiti projects throughout the country. Recognizing that different people have differing opinions about graffiti, this option will be left in the plan and details like whether or not to include a graffiti amenity will be determined during the specific project development phases for the parks.</p>

8	<p>Comment from Public Art Forum: (Suggested addition to text) Establish a Process: The DRWC with the City’s Public Art Program, should jointly create a Public Art Advisory Committee composed of art and design professional, to review and oversee all public art proposals for the waterfront as they impact the public environment. This is especially important for any projects that will require Art Commission review for conceptual approval. (referring to page 119 in original draft)</p>	4	<p>The plan states that waterfront projects should comply with the city’s public art programs. The option for a waterfront public art advisory committee requires more discussion before implementation or inclusion in this plan.</p>
9	<p>Comment from Public Art Forum: (Suggested addition to Text) Planning: A Public Art Master Plan will be commissioned for the waterfront, to be overseen by the Public Art Program, OACCE, and all public art projects for the area must comply with that plan. (referring to page 119 in original draft)</p>	4	<p>A public art master plan could be a next step after this master plan, but this will not be included as a recommendation at this time.</p>
10	<p>Comment from Public Art Forum: (Suggested addition to Text) Quality and Originality: Public art projects must be original works of art, of the highest quality, and conceived by an artist-a practitioner in the visual arts generally recognized by critics and peers as a professional possessing serious intent and ability who is not a member of the Project Consultant’s team or employed thereby. These recommendations are consistent with best practices in the field of public art. (referring to page 119 in original draft)</p>	4	<p>The intent for the plan is to maintain flexibility for various forms of art for the waterfront. Therefore the final document does not make this specification. However this comment requires additional discussion outside of the master plan.</p>
11	<p>Comment from Public Art Forum: (Suggested addition to text) Funding: Public art requires a budget commensurate with building construction and development, so that the artist has the resources to create work that is of a material and scale compatible with the setting. Funds should be incorporated in the project budget and dedicated at the beginning of the project, simultaneously with other project funds.</p>	3	<p>Somehow this text was included in the draft plan at one point but accidentally omitted in the version released on July 25. It has been corrected in the final version.</p>
12	<p>Comment from Public Art Forum: (Suggested change to text) Oversight: All waterfront public art projects will require the involvement of the Public Art Office, City of Philadelphia Office of Art, Culture and the Creative Economy (OACCE), and may require conceptual and final approval from the Art Commission. (The Public Art Master Plan will further address issues of oversight and approvals.)</p>	8	<p>The plan does not make statements about jurisdiction for public art review. This requires more discussion, and is outside the scope of this plan.</p>
13	<p>Comment from Public Art Forum: The plan should replace all references to “sculpture” with the term “public art”</p>	3	<p>Incorporated in final plan.</p>
14	<p>Comment from Public Art Forum: Public art should be introduced in the “Public Realm” section of the master plan (currently just noted in the Waterfront Activation section) so it is part of the overall thinking about waterfront development, not only perceived as an action item.</p>	3	<p>Incorporated in final plan</p>

15	<p>Comment from Public Art Forum: All artwork images reproduced in the Master Plan document must be properly attributed to the artist, with title of the artwork, date, and location of the work— see the attached for suggested caption information. Additionally, please identify the building name and location of the art studio on pg. 120, the performance pavilion on pg. 121, and further describe the image of the MASS MoCA gallery [i.e., it represents the conversion of a 19th century textile mill into a contemporary art center in North Adams, MA]</p>	3 / 8	<p>Space for captions was limited in the plan; however, an attempt was made to provide as much information as possible for these images. The art studio caption for the MASS MoCA gallery was not changed due to space constraints.</p>
BOATING			
16	<p>With exception of the Phila Marine Center and Penn's Landing, where would the recreational boater, both local and visiting, be able to dock their vessels in order to visit the central Delaware River waterfront? These docking facilities should be provided in order for these persons to take advantage of the various parks, entertainment and other venues along the waterfront. These docking facilities would greatly improve the overall usability of the waterfront. Thanks for the opportunity to comment on the draft Master Plan.</p>	5	<p>There are several locations identified in the plan for transient slips close to amenities. Refer to the Public Realm Plan and the Park Design Guidelines, both located in the Public Realm section of the plan (pages 102-117) as well as the Waterfront Activation map (page 120)</p>
17	<p>I have read your marina review and I suggest that you continue to include as many transient slip as possible. These slips need to be manned and have water and electric. Most boaters do not find it easy to have Philadelphia as a destination for a day's outing or dining. As a boater, I would be interested in sharing my views with your committee. Thank you.</p>	5	<p>See comment above.</p>
18	<p>I would like to commend the study recognizing that boaters are frustrated with the limited options for day use to access all the amenities of downtown Philadelphia. In contrast to Baltimore for example, access is poor or expensive. Further, I run a charter boat business that would benefit greatly if commercial options were available for tourists to access the waterfront and charter boat services.</p>	5	<p>See comment above for transient boating. As activity increases along the waterfront there will be more opportunities for entrepreneurs to open services such as charter boats.</p>
19	<p>I am impressed with the plan. I like the idea of trolley cars having people places and walkways. My concern is that there are enough places for small and medium sized boats to tie up to visit Philly be it an hour, day, or week. There are many boaters that want to come and visit, but are turned back because no suitable place to tie up. If it was available and easily accessible many long cruising boats would come to Philly before going down the C and D canal. Pier 3 and 5 may have one slip and to find out info is hard same with Dave and Buster Marina. There is an arrangement of leaving the rock to hold the gate open. I don't know what is happening at Penn's Landing but the slips are in bad shape. I do see boats in your pictures and hope that works and is a small charge not an arm and leg for short stays.</p>	1 / 2 / 7	<p>See comment above on boating facilities. In the spring of 2011 DRWC invested over \$1.5 million in the marina at Penn's Landing. The basin was dredged and the docks were completely replaced.</p>

20	Recreational uses including canoeing and kayaking adjacent to a navigation channel for large ships. Informal discussion with a seasoned riverboat pilot suggests that amateur boaters in tiny vessels adjacent to the shipping channel are a dangerous idea especially just north and south of the Anderson properties.	7	Agreed. The plan only recommends this type of boating activity in locations that are protected from the shipping channel like the basin at Penn's Landing and areas in between some piers.
	LARGE BOATS		
21	What is the possibility of including our nation's iconic flagship, the S.S. United States as it is repurposed as a real estate development catalyst with over 600,000 square feet? Outside of the Navy Yard, where could the ship fit on the Delaware Riverfront between Philadelphia and Chester, PA?	5	This ship is now owned by the S.S. United States Conservancy; at such a time that the conservancy determines that the ship will stay in Philadelphia and has a redevelopment plan, DRWC would be thrilled to discuss an appropriate location on the Philadelphia waterfront.
22	The ship that is in front of Ikea could be a hospital, junior and senior school, or horticultural garden	5	See above.
23	Why is the historic cruiser Olympia not included in the plan? Our organization has support from congressmen and senators to keep her vital part of the Philadelphia waterfront	5	The Independence Seaport Museum has decided to divest itself of both the Olympia and the Becuna. The relocation of these vessels from their current site in the Penn's Landing basin is key to the successful redevelopment of this area. DRWC does hope that both vessels will eventually be in the hands of financially-sound organizations dedicated to their preservation, and DRWC would work with these groups to find suitable locations on the waterfront should they stay in Philadelphia.
24	Ships – Don't see Moshulu, Olympia or submarine in renderings. Would be nice to keep of maritime history in place.	5 / 7	The Moshulu is shown relocated south of the Chart House in the plan. See above for discussion of Olympia, Becuna, and S.S. United States.
25	Navy Yard has 2 carriers. Why not refurbish them and other ships, like the S. S. United States? Maritime museum? Reading Viaduct?	8	See comments above.
	ACTIVE RECREATION / PROGRAMMING		
26	Below is an article about the model boat pond in Central Park in New York City. I was wondering if this could be incorporated somewhere along the Delaware. Inspired by the model boat ponds of late 19th century Paris, Frederick Law Olmsted and Calvert Vaux created a place where children and adults alike could experience the pleasure of boating, in addition to the other attractions Conservatory Water has to offer. Not an original part of Olmsted and Vaux's "Greensward Plan" for the Park, Conservatory Water was initially intended to be a small pool for a glass house and formal, ornamental flower garden. When the upkeep of this plan proved too costly, Conservatory Water and Conservatory Garden were created in its place. This 72nd street site is bordered by the whimsical Alice in Wonderland statue to the north, as well as a sculpture of author Hans Christian Anderson reading his tale, The Ugly Duckling, to the west. While open for ice skating during the winter months, the pond is best known as a place for boating in spring and summertime, mentioned as such in E.B. White's Stuart Little. Surrounded by the pink and white blossoms of spring blooming cherry trees, Conservatory Water holds its boating season from April to October each year. Boat rentals are available at the Kerbs Memorial Boathouse, as are lessons for the budding model boat enthusiast.	4 / 5	Thank you for sharing.

27	Can there be sand volleyball courts and playing fields included in the park areas? This type of thing seems to generate interest and gets people to these areas.	4	The park design guidelines section recommends general locations for various types of active recreation. These activities will be planned as each park is developed, and will include a public process.
28	Ben Franklin Bridge: Send out RFP for a company to create a "Bridge Climb" al la the for-profit highly successful Bridge Climb utilizing the Harbor Bridge in Sydney, Australia see link and talk to Sydney Company executives for implementation and best practices:(http://www.bridgeclimb.com/)	5	See comment above.
29	Sports – In addition to walking / biking trails, it would be nice to see tennis courts, climbing walls, skate parks, etc.	4	See comment above.
30	Kudos and congratulations to all who have worked so diligently to bring this plan to life. If I had to add one thing that I didn't see it would be an olympic size swimming pool with a retractable roof, which could put Philadelphia on the map for swimming events and competitions. It would complete the sports complex of which we are so proud of.	1 / 4	See comment above.
31	Beaches: Create beaches on Petty Island and multiple other locations along the water front. Truck in sand from NJ beaches. Sand for beaches should be laid down past shoreline in swimming areas to eliminate "mucky" river bottom for swimmers. Residential Beach Neighborhood. Transport in large amounts of sand to create beach area backed by residential housing with "beachfront" properties and a neighborhood with a "shore" feel. Community should be modeled on NJ or CA beachfront neighborhoods/communities.	8	Traditional beaches are not practical in this part of the waterfront due to currents, tides, and wave action from large commercial ships. However, the plan for the Berks Park included an idea for an "urban beach" which would have sand on top of piers to be used as a beach for beach volleyball.
32	Lifeguards and designated "filtered" swimming areas should also be considered. Look to the beaches that Chicago set up on Lake Michigan for implementation and best practices. Note: "Filtered" refers to roping a swimming area off with nets to filter any trash from the current.	4	Swimming of this type is possible and is an idea that is suggested for the area around the Berks Park; however, implementation of these types of facilities will need additional study after this plan is complete.
33	If Vetri and Starr can team up on N. Broad, why can't they do it on the waterfront. I think a man-made sand beach at Penn's Landing with volleyball, benches and a tiki bar would be great. You should also consider smaller scale dinner/booze cruise boat activities.	4 / 8	See comment above on beaches/Berks Park.
34	Why not spend time and money developing the site exclusively for children?	4 / 7	Many locations on the waterfront are planned to be family-friendly. See park design guidelines.
35	Any thought for things for children to do? Maybe like a Disney Quest, Movie Theaters, etc.	4 / 7	Commercial activities such as these are outside of the scope of the master plan, but creating the public spaces in the plan will provide many opportunities for various commercial enterprises.
36	I still think the waterfront needs a touristy attraction to get people to the river. A permanent/temporary carnival/amusement park could be done tastefully with a ferris wheel, mini golf, or merry go round.	4	See comment above
37	Mini zoo/llama rides??	4	See comment above

TRANSPORTATION COMMENTS

RESPONSE CODES

- | | |
|---|---|
| <ul style="list-style-type: none"> 1- Positive comment; no response required. 2- Action already taken outside of master plan. 3- Good comment; changes made in final plan. 4- Good comment, but will be addressed during project development phase therefore not included in master plan. 5- DRWC concurs with comment, but issue is not under DRWC jurisdiction. In some cases DRWC could advocate with other agencies. | <ul style="list-style-type: none"> 6- Comment is outside of the scope of the plan. DRWC does not concur, and will not advocate. 7- Misreading of the draft plan. In some cases final plan has been altered to be more clear about intentions. In other cases DRWC did not concur and did not make changes in the final report. 8- Considered, but not feasible for project area. |
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	Comment	Response Code	Response Explanation
	TRANSIT		
1	Comment from CDAG: Transit solutions are balanced, phased, and achievable CDAG commends the multifaceted, balanced, phased, collaborative approach to the short-term and long-term transportation solutions that have been added to the Master Plan since our comments of June 2011.	1	
2	I-95. We can't bury it, can't elevate it. So, what can be done to mitigate the impact of I-95 on the Central Delaware?	7	The plan proposes a cap over I-95 between Chestnut and Walnut Streets, as well as numerous other recommendations. See Transportation section, pages 143-177
3	Why didn't you maximize the opportunity of covering over expressways. I-95 & I-676 both have excellent opportunities in their existing configuration to cover over and increase the amount of parkland for the future of the city.	7	See comment above.
4	Might there be an early opportunity to use noise reducing paving on I-95 as it goes through this area?	5	DRWC will refer this comment to PennDOT.
5	What are the opportunities for I95 to become better? P134	7	Most of the recommendations in the transportation section are targeted at mitigating the barriers of I-95. Specifically, see the Transportation section, pages 143-145 and 147-153.
6	I am glad to see that Front Street is mentioned as a possible connection for the waterfront light rail system, but I was confused because the transit plan doesn't match the text on page 153 (page number in original draft). Specifically, the alignment shown on the transit graphic uses Dock Street/3rd Street instead of Front Street.	3	This was an error in the draft plan and has been corrected in the final version. Thank you for bringing it to our attention.

7	<p>The draft Master Plan for the waterfront looks great. It strikes a good balance between ambition and reality.</p> <p>I have some specific comments relating to transit connections. While upgrading the Columbus/Delaware ROW for light rail makes perfect sense, and eliminating the scissor ramps is excellent, I don't see the point of spending significant capital dollars on laying at-grade rail right on top of the existing MFSE track on Market Street. Duplicating one of the few rail transit lines we have seems wasteful. (I realize that various alternative routes have been contemplated in earlier studies, but I remain convinced that the correct solution is yet to be found.)</p> <p>Perhaps the proposed inland routing south of the planned Chestnut/Walnut "great lawn" makes sense, as it may serve some existing residents. Either taking that line due west through Society Hill and/or due north to Independence Hall & 5th & Market would avoid duplication of service.</p>	1 / 5	<p>Details of the rail system will be further studied as that project progresses. This study was outside the scope of the master plan.</p>
8	<p>It may be valuable to explore adding an MFSE stop at the Race Street Connector. In fact, the MFSE leaves the Center City tunnel at precisely this point (south side of Race Street), creating the optimal circumstances for building a station. This location has several advantages as a transit stop:</p> <ul style="list-style-type: none"> • It creates access at the longest stationless stretch of the route (the distance as the crow flies between 2nd & Market and the Spring Garden Station is the same as from 2nd to 11th Street). • It is almost the closest part of the MSFE route to the river. An El entrance at Race Street would be in direct line of sight with Columbus Blvd and thus with light rail there, making for very easy transfers (especially with a new fare collection system in place). • It serves the Race Street Pier and Connector projects, which hope to jump-start the plan north of Penn's Landing. (And the ridership would help police the Connector.) • It would actually fill in the meaningless, anti-urban mess that is the I-95 underpass. <p>With an El stop so close to the river and in such a central location, it is quite possible that taking the El to Race Street would become one of the key ways to get to the waterfront.</p>	5	<p>DRWC concurs that a potential stop at Race Street could provide excellent service to the waterfront and has referred this comment to SEPTA. However, this idea has not been included in the plan because more study is required to determine feasibility.</p>
9	<p>I couldn't find a map that shows the new "yellow and red" waterfront bus routes, but there is a reference to this map on Page 155 (page number in original draft)</p>	3	<p>This was an error in the draft plan and has been corrected in the final version. Thank you for bringing it to our attention.</p>
10	<p>Will the Columbus Ave light rail run to the sports complex so we don't have to subway to Broad Street?</p>	5	<p>Details of the rail system will be further studied as that project progresses. This study was outside the scope of the master plan.</p>
11	<p>I do not live close to the 6-mile stretch of the Delaware. Driving and parking are not feasible. The SEPTA bus pass - too expensive. The bus/train pass wastes paper!! (SEPTA) Why not once a year a free SEPTA Transpass. One Transpass a year per rider.</p>	5	<p>This comment is outside of the scope of the master plan, but has been referred to SEPTA.</p>

12	How will the Navy Yard be connected to the city of Philadelphia? Light rail, extending the Broad Street Line?	5	These connections are outside of the master plan, but have been addressed in the City Planning Commission's new comprehensive plan: Philadelphia 2035.
13	In what way is the Plan for the Central Delaware including the Philadelphia International Airport and its shareholders: US Airways, the FAA, the Capacity Enhancement Project which includes a new runway, UPS, townships south of the airport in Delaware Co.; i.e. Tincum Township.	5	See comment above.
	DELAWARE AVENUE / COLUMBUS BOULEVARD		
14	Outstanding presentation. I am thrilled you are starting with the three areas which you own so that Philly citizens and developers will get excited about this endeavor. ASAP please landscape the median strip on Delaware Ave between Penn St. and the casino. You have done a very beautiful job of landscaping the median strip all along Delaware Ave/Columbus Ave., but it is very sad to see it stop at Penn St. Please respond if you have any information on this small, but important area that needs landscaping that coordinates with the existing and be lovely landscaped median strips. Thank you.	2	In the long term, the plan proposes a complete reconfiguration of Delaware Avenue to make it more pedestrian-friendly and include transit. Landscaping would also be done at that time. However, DRWC sees the value in short-term improvements to the boulevard and is seeking funding for various improvements such as this one.
15	Comment from CDAG: Walking Trail Along Columbus Blvd./ Delaware Ave. Trees alone are not a sufficient buffer Trees alone are not a sufficient buffer; there needs to be a more substantial, human-scale vegetation buffer, combined with shade trees, to separate heavy vehicular traffic from pedestrian traffic, where the walking trail must be positioned adjacent to the roadway.	7	The plan does include a significant planted buffer with both trees and other types of landscaping in order to protect the trail from the vehicular cartway.
16	(89, 146: page numbers in original draft) Multi-use trail does not seem substantially different from the bike trail/sidewalk we now have, other than being wider. Trees provide no more buffer from cars than a light pole. Almost complete visual screening is needed between pedestrian/bike and cars.	7	See comment above.
17	In progress drafts I had noticed the discrepancy between the drawing and the labeling on the Delaware River cross-section page. Since it's still that way in the final draft, I thought I would call your attention to it.	3	This was an error in the draft plan and has been corrected in the final version. Thank you for bringing it to our attention.
18	Comment from Bicycle Coalition of Greater Philadelphia: We're still very concerned that the master plan (over the long term) may be proposing to eliminate the existing bike lanes on Delaware Avenue. We recognize that more concrete planning for transportation will occur once a traffic study is complete. We would prefer that room be made to create buffered bike lanes on Columbus/Delaware and that a recreational trail for bikes be added on the eastern side for slower, less and more recreational trips. Losing the southbound bike lane on the west side would be very problematic and we recommend against such in future iterations of the plan.	4	The exact configuration of Delaware Avenue will be determined following additional studies like the traffic study that is currently underway; however, DRWC concurs that consideration should be given to all types of bicycle users when making decisions about locations and types of bicycle facilities on Delaware Avenue.

19	<p>Comment from Bicycle Coalition of Greater Philadelphia: Page 145 and 146(page numbers from original draft) –The bikeway path dimensions and nomenclature don't match up on these two pages. On page 145 Zone 3 the 38 foot cross section calls for a 12 foot wide "multi-use trail" while the illustration on page 146 shows a 10 foot wide "two-way bike" in the cross section.</p> <p>Our recommendation is changing the term to cycle track and giving the cycle track 12 feet in the 38 foot cross section to serve as a start point. Our experience with trail design in constrained areas is that the trail will often be narrower than prescribed.</p>	3	<p>This was an error in the draft plan and has been corrected in the final version. Thank you for bringing it to our attention.</p>
CONNECTOR STREETS			
20	<p>We are very excited with the prospect of having the streets re-connect to the waterfront, for too many years we have been cut off from the river. It will be nice to be able to walk down safe, well-lit streets and watch the boats go up and down the river.</p> <p>We are also looking forward to having better transportation serving this area. With the prospect of more entertainment we will need a better way to access the waterfront. Automobiles will not be the best mode of transportation in the future, we will need a number of other vehicles be it water taxis, trolleys, or monorail and of course by foot with the new promenade.</p>	1	
21	<p>Comment from Bicycle Coalition of Greater Philadelphia: Page 141 (page number from original draft) – Spruce St and Dock Street should be upgraded to primary connector streets because they are significant bike traffic entry points. The main issue with both streets is that they are bumpy belgian block street surface and a 5-6 foot wide strip of block would need to be replaced with asphalt or concrete. Another option is to sign and modify the sidewalks to accommodate inbound traffic to Spruce Street and outbound from Front Street. We urge you to consider this as an early action item to connect Spruce and Pine Street bike lanes to Columbus Avenue.</p>	3 / 4	<p>DRWC recognizes that this connection is an important one. The intention for the primary connector streets was that these would connect with the half-mile parks along the waterfront. DRWC will absolutely advocate with the city for improvements to Dock and Spruce Streets in the short-term to establish better bicycle connections to the waterfront.</p>
22	<p>Comment from Bicycle Coalition of Greater Philadelphia: Page 142 (page number from original draft) – Race St Connector Illustration – The bike lane design is substandard in the illustration and appears to be obsolete. The illustration depicts 4 foot wide bike lanes (too narrow), a right turn conflict at Columbus Avenue, and a bike lane on 2nd Street, which doesn't currently exist. Please replace with the final design approved by the Streets Department.</p>	2	<p>This image was an old version of the plan for Race Street and has been replaced with the final version of the Race Street plans, which correct all of these problems. Thank you for bringing it to our attention.</p>
23	<p>Comment from Bicycle Coalition of Greater Philadelphia: The map should name Spruce, Pine and Dock Streets</p>	3	<p>This was corrected in the final plan. Thank you for bringing it to our attention.</p>

24	<p>Comment from Bicycle Coalition of Greater Philadelphia: Page 144 (page number from original draft) – “Bicycle only trails”, “two-way bike” and “bike trail” should be renamed everywhere in the document: Separated by paint from motor vehicle traffic – Buffered Bike Lane Physically separated from traffic (but not shared with pedestrians) - Cycle Track Bicyclists and pedestrians share the same path – Multi-use Trail</p>	3	<p>There were many inconsistencies in how the draft plan labeled bicycle facilities and we have corrected this in the final plan. Thank you for bringing it to our attention.</p>
PARKING			
25	<p>Underground parking should be mandated for large developments.</p>	7	<p>Underground parking is not feasible on the waterfront because of the location of the water table. However parking must be handled well on the waterfront; recommendations are included in the Implementation section on pages 217-251.</p>
26	<p>Parking under I-95 should be maximized. Additionally, capacity can be increased by creating 2-3 stacked parking decks under 95. This reduces the need to utilize valuable riverside land to create parking and it also increase aesthetics by removing parking decks from visible areas.</p>	7	<p>DRWC will consult with PennDOT for various locations where parking under I-95 may be appropriate as PennDOT has held recent public meetings on this topic for the section from Race Street to Allegheny Avenue.</p>
27	<p>Your master plan seems to think that parking is a key part of revitalizing the area. While that may be true the last thing we need to add are parking minimums on new builds.</p>	7	<p>The master plan does not require minimum parking requirements for waterfront development and notes that they can be problematic and result in too much parking which can deaden urban areas. This issue is not only an issue for the waterfront specifically, but for the city as a whole. The draft of the new zoning code contains updated parking requirements. Waterfront development will have to meet city parking requirements and more specific parking requirements for the waterfront will be addressed when the waterfront overlay portion of the zoning code is drafted later this year. DRWC has clarified the text on parking in both the Transportation section on pages 173-175 and in the Implementation section on pages 217-251.</p>
28	<p>The master plan should explicitly state that there should be no parking minimums associated with new development. The current zoning regulations make new development along the lines of the city's most popular neighborhoods impossible. Any "master plan" should favor Philadelphian pedestrians, cyclists, and transit users over suburban commuters.</p>	7	<p>See comment above.</p>
29	<p>Very disappointed to not see anything about minimum parking requirements in this plan. You say that you're for sustainability and reducing car dependence, but the requirements that developers build parking for residents, even if they don't think they need it, run directly counter to this. They are the citywide norm, and by not mentioning them in the report, the implication is that you will leave them in place for new development ("Increased parking opportunities for recreation areas and new development" on pg. 243 of the Implementation sec.). Please don't institute minimum parking requirements for developers here – it's not how Philadelphia developed historically, and it's not how Philadelphia should develop in the future.</p>	7	<p>See comment above.</p>

30	Please remove the regulations requiring that a minimum number of parking spaces be created in order to accommodate any new construction. These regulations do not make sense for our city. Old City and Penn's Landing do not need more parking.	7	See comment above.
31	I would like to offer my thoughts on the removal of parking minimums for the Central Delaware plan. Market forces should decide what land should be given over to parking, not an arbitrary government regulation. Land is valuable and to require developers to dedicate this scarce resource to accommodate parking is silly, especially considering the increased connections via public transportation and cycling.	7	See comment above.
	WATER TRANSPORTATION		
32	Water Taxi: Multiple stop locations on both sides of the river. At each location there should be a "call button" and the taxi should arrive w/in 5 minutes of the "call button" being pressed.	4	Water taxi service is in the planning stages for the waterfront, and details like this one will be determined during that phase.
33	Petty's Island is becoming a public park in the near future. Is there a plan for a ferry from PA side?	5	Yes, the plan identifies Petty's Island as a potential stop for either a ferry or water taxi, as noted in the Transportation section.
34	No mention of the existing abutments for the defunct river tram. Will these be demolished or can an aerial tram work?	7	This support for the tram project is shown as demolished in the plan.

ECONOMICS COMMENTS

RESPONSE CODES

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| <p>9- Positive comment; no response required.</p> <p>10- Action already taken outside of master plan.</p> <p>11- Good comment; changes made in final plan.</p> <p>12- Good comment, but will be addressed during project development phase therefore not included in master plan.</p> <p>13- DRWC concurs with comment, but issue is not under DRWC jurisdiction. In some cases DRWC could advocate with other agencies.</p> | <p>14- Comment is outside of the scope of the plan. DRWC does not concur, and will not advocate.</p> <p>15- Misreading of the draft plan. In some cases final plan has been altered to be more clear about intentions. In other cases DRWC did not concur and did not make changes in the final report.</p> <p>16- Considered, but not feasible for project area.</p> |
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	Comment	Response Code	Response Explanation
1	Will the housing be mixed-income/are there more specific plans for what income levels the residential areas will serve?	4	This detail will be discussed as an overall city policy as projects move towards development. Consideration is given in the new zoning code for bonuses for developers providing mixed-income prices for developments.
2	I was disappointed to see that there is no plan for mixed-income housing, or any sort of subsidized/low-income housing. Please let me know if this is, in fact, part of the plan, but has been omitted from the publication. Thank you.	4	See comment above.
3	Question great payback from public investment in infrastructure on the waterfront	7	The economics consultant has identified both the specific investments in public infrastructure that are critical for development to occur (and therefore does have a return on investment for the city) and those investments which are not critical for development to occur, but which will help to establish the waterfront as an amenity for the city, and should be therefore undertaken as funding allows. See Economic section on pages 179-201.
4	DRWC mentions the private development of public lands they own to serve as a model of good development and to raise money for other public projects. Couldn't activity on the riverfront be stimulated by a simple multi-purpose trail that is much less expensive than the plans proposed?	7	The plan included detailed cost estimates that DRWC and the consultants have determined are reasonable costs for a project of this size. Exact details (and cost) will be determined as each project proceeds through design and development.
5	Section II of the Master Plan contains an economic analysis that includes estimates of the current values of construction prices per square foot and corresponding values necessary to support construction. The sources of this data are not identified with specificity and it is unclear whether additional sources should be consulted. At a minimum, sources should be identified with specificity and some qualifying remarks should be included.	7	The plan used a highly qualified and reputable cost estimating firm, Davis Langdon, to do the cost estimates, and then the cost estimates were reviewed in great detail with the project team and adjustments were made where necessary. Therefore we are confident that the estimates are as accurate as can be for a master plan level of detail.

<p>6</p>	<p>The plan shows site plans which call for excessive additions to the public realm without any discussion of a land acquisition strategy, market demand or public funding availability. The proposed uses of the Anderson properties (parks, open space trails, riverfront streets) all require land acquisition by some public authority. At the same time, the Plan gives funding priority to three other geographic locations where the public actually controls the land (Washington Avenue, Penn’s Landing, and Spring Garden/Festival Pier). Since the release of the Plan, an additional priority area has been added on your web site, Penn Treaty Park and certain areas to the north.</p> <p>The Plan recommends that \$65 million in public money be spent in the next six years to focus the three priority sites. Are the cost estimates for those projects reasonable? The specific projects have not been identified nor have cost estimates been provided to confirm their feasibility. We question the ability of DRWC and the City of Philadelphia, no matter how well managed, to complete the priority tasks and take on additional acquisition as well. If the Planning Commission adopts the Plan, it must, as a matter of policy, include the Plan’s capital spending within the City’s total capital funding needs. The Plan has an initial price tag of \$770 million and projects an annual drain of \$8.25 million along with a \$65 million jump start for infrastructure improvements. While we hope that DRWC considered the impact of such a commitment to this section of the City on the remaining infrastructure needs, if City Council is unable to find the funds, the development of our properties within the Plan is pushed further into the future. We see no contingency plan if City Council is unable to provide the necessary funding because public demands in existing neighborhoods will not allow investment to create a new and advantaged neighborhood.</p>	<p>7</p>	<p>The draft plan had conflicting language on “priority sites.” Text in the final plan has been changed to be clear that there are only three priority sites (Washington, Penn’s Landing, and Spring Garden). Penn Treaty is not a priority site, but development in this area is projected to occur within the 25-year timeframe of the plan.</p> <p>See comment above on cost estimates, as well as detailed analysis in the Economics section on pages 179-201. With respect to justification for the \$65 million infrastructure jump start number, DRWC has been administering funds of over \$10 million per year over the past 2-3 years on infrastructure improvements by matching city capital funding with other federal and state grant programs as well as foundation contributions and could reasonably expect this level of investment to continue for the next several years.</p>
<p>7</p>	<p>Minority owned opportunities implies African-American. What about LGBT minority owned businesses?</p>	<p>5</p>	<p>The opportunities outlined in the plan were based on how the City of Philadelphia recognizes minority firms. DRWC will follow the city’s lead on this issue.</p>

IMPLEMENTATION / LAND USE COMMENTS

RESPONSE CODES

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| <ul style="list-style-type: none"> 1- Positive comment; no response required. 2- Action already taken outside of master plan. 3- Good comment; changes made in final plan. 4- Good comment, but will be addressed during project development phase therefore not included in master plan. 5- DRWC concurs with comment, but issue is not under DRWC jurisdiction. In some cases DRWC could advocate with other agencies. | <ul style="list-style-type: none"> 6- Comment is outside of the scope of the plan. DRWC does not concur, and will not advocate. 7- Misreading of the draft plan. In some cases final plan has been altered to be more clear about intentions. In other cases DRWC did not concur and did not make changes in the final report. 8- Considered, but not feasible for project area. |
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	Comment	Response Code	Response Explanation
1	It's unfortunate that you ignore your own principles for low/mid-rise use and less density on the Festival Pier site. Your design favors developers at the expense of existing neighborhoods. You have partly occluded the view to the water from Spring Garden St. and neighbors to the north with an "alley" that will be in shadow much of the day. Instead of a grand celebration of the water, we will view a small part of it through the ends of two hi-rises. The rest of the master plan is truly exceptional. I hope this misstep on Festival Pier is fixed with more low-rise buildings and views.	1 / 4	The final plan has a more detailed discussion of height than what was in the draft plan, including a list of criteria where height above 90 feet could be appropriate. See the Implementation section, pages 232-235. The Spring Garden site, depending on design, could fit the criteria listed; however, the plan recommends that any project above the height limit proposed for the whole waterfront require a variance, which would include the Spring Garden site and any projects on DRWC and/or City property.
2	P210 – 90' height allowance not in concert with stated goal of extending existing fabric of Philadelphia to the waterfront--this is private tower development. Continuation of the existing fabric requires the height allowance to be 35', with possible exception of area near Old City.	7	See comment above.
3	How are you going to get the big boxes to move from their existing locations? Super Fresh, Home Depot & Walmart are the three big boxes that I'm questioning	7	There are many existing uses that are shown as changed over the timeframe of the plan. These projections are based on long-term changes in land use for the waterfront as a whole. In general, as land values change, large format retail stores move to less valuable property.
4	Question overall premise that the waterfront should be densely developed. Philadelphia lost 500,000 residents in the 50's. If we indeed grow by 100,000 in the next 25 years it would be better to absorb the new residents in areas with existing infrastructure and maintain the undeveloped waterfront for public use.	8	The city would not ever be able to acquire or maintain the entire waterfront as public space, as 90 percent of it is currently privately owned.
5	All E/W street sidewalks should be continuous with curbcut limitations.	7	Curbcuts must be allowed in order to provide access to development sites. It would not be feasible to prohibit curb cuts on all East/West streets, so the plan recommends locations where this is the most important (on primary connector streets).

6	<p>p209 – 50’ setback and then a road –100’ to buildings is too close - no legitimate public space.</p> <p>p209 – no setback requirement between Washington and Spring Garden?</p>	7	<p>Many successful waterfronts have setbacks of 50 feet or less. The recommended setbacks in this plan were carefully formulated to provide an urban, developed waterfront with larger parks (and therefore setbacks) spaced at close half-mile intervals. This plan was not intended to create a park such as Fairmount Park on the Schuylkill River. A setback is not required in the center section of the waterfront because the right of way of Delaware Avenue/Columbus Boulevard is directly adjacent to the river’s edge and a “setback” is not feasible here.</p>
7	<p>As a longtime Queen Village resident, bicyclist, and devotee of the Delaware waterfront, I'm delighted at DRWC's plan for the Central Delaware and its focus on restoring public accessibility to the river. I urge DRWC and the city to make untrammled public access to the water's edge a major imperative as they execute the plan. The exclusionary mentality of the two "gated community" high-rises just south of SugarHouse is quite destructive of this ethic and must be prevented in the future -- and corrected, if possible. Thanks to all for the good work.</p>	1	<p>Yes, waterfront public access is a primary tenet of the master plan, and the plan recommends that the City implement zoning that requires a building setback from the river’s edge.</p>
8	<p>We are concerned about the development of a seasonal performance venue. For something like this to happen we will need to have a lot more information to make sure it doesn’t impact nearby residents. We are also concerned about our neighborhood become the “entertainment district” while we like the idea of having more family friendly facilities, we do not want to become the nightclub mecca for the City of Philadelphia, that should stay downtown where it is.</p>	3	<p>The wording was edited in the final plan to make it clear that this venue is proposed as a cultural and community asset, not a nuisance. As this is a mid- to long-term proposal, there will be numerous public meetings prior to such a facility being built that would address legitimate concerns and insure that the facility is an asset to the community.</p>
9	<p>We recognize that industry is very important to the waterfront; however we also know that the waterfront will never be as it was one hundred years ago. Because of this we feel that there needs to be some residential mixed in with the light industry that is planned for the area north of Frankford Avenue. We are very concerned about the waterfront becoming an area that people will only use for work or if there is a special event. With a mixture of residential we will not have these dead zones and it will encourage more and more people to utilize the waterfront. All you need to do is go to Pulaski Park at dusk to see what I mean.</p>	4	<p>Based on projections from the City Planning Commission’s Philadelphia 2035 plan on population increase and absorption rates, there will be only a certain amount of new residential development in the entire city. The entire waterfront will therefore not be able to support residential development. Consequently, the plan recommends the best locations where residential uses should be focused. This does not mean that in the area north of Schirra Drive residential cannot ever occur, it just means that the plan recommends that it happen in other, more supported areas first.</p>
10	<p>Comment from CDAG: Projected Land-Use Program Industrial-exclusive program fails to connect with the adjacent community In order to fulfill the key goal of reconnecting neighborhoods to the river, usage dedicated to industrial, commercial, and large-scale entertainment should be generously interspersed with mixed residential uses. The residential component of this mixed-use approach increases the diversity of land uses and enhances the stability of the social fabric through future fluctuations in the economy.</p>	4	<p>See comment above.</p>

11	<p>Comment from CDAG: Urban Edge Management and Program Commercial frontage should be focused on the street side, not the river side Curiously, the maps in the Implementation section showing ground-floor activation and street-wall build-to locations seem to promote a hard urban edge on the riverfront, while not holding the hard urban/activated street line on Delaware Ave./Columbus Blvd. This seems the inverse of the principles of the Civic Vision. CDAG recommends focusing ground floor commercial activation and a hard urban street edge on the street side rather than the river side. This allows for a staged softening of the urban fabric moving from the city towards the river, more effectively attracting people to the commercial corridor of Delaware Ave./Columbus Blvd., and then eastward to the waterfront, where we recommend allowing the river edge to be greener and softer.</p>	7	<p>Again, there is only limited commercial/retail that the market will be able to support. It is not possible or feasible for the plan to recommend retail lining the entire length of Delaware Avenue/Columbus Boulevard and lining the entire waterfront. Therefore locations for retail have been carefully chosen on a site by site basis in order to activate the most important places for that site. The river edge is bulkheaded in many locations, and therefore will not necessarily be “green” or “soft”; however, in most cases there will be landscaping along the waterfront.</p>
12	<p>Comment from CDAG: Spring Garden Site and Connector Spring Garden site must be developed through a rigorous public process CDAG recognizes the need for the Spring Garden site to balance waterfront access and recreation with development to activate this site and raise revenue. The Master Plan has the potential to achieve this balance, but questions remain about the height and massing of mid-rise structures, and the relationship to the adjacent developed parcel to the north. Because this is the largest contiguously-owned parcel controlled by the DRWC, CDAG recommends the RFP process fully engage both CDAG and the public, to ensure the delicate balance necessary for this site is preserved in the final product.</p>	3	<p>DRWC concurs, and text was added to the final plan to make it clear that all sites owned by either the DRWC or the City will undertake an appropriate public process as they are developed.</p>

13	<p>Comment from CDAG: Zoning The Master Plan will live or die with the details of the zoning component codifying its principles. Because the zoning component has not yet been written or presented to CDAG or the public, many of our previous comments and concerns require continued emphasis (also see items 14-17 below): Re-Mapping Recommendation: Re-map the Central Delaware now Few parcels of the District are properly zoned for the uses proposed by the Master Plan. Re-mapping is essential to minimize the need for zoning variances as development occurs. Variance-driven development on the waterfront would open a Pandora’s Box that could spell a slow, agonizing “death by a thousand cuts” for the Master Plan, eviscerating its principles and proposals, parcel by parcel and project by project. CDAG urges the DRWC to include a proposed re-mapping of the entire District when it presents the Master Plan to the Planning Commission, and the zoning component to City Council. Immediate re-mapping could also make palatable the majority of the proposed height controls recommended in the Master Plan, or render the height controls unnecessary, if an appropriate underlying zoning classification such as the new CMX-2.5 were assigned to most parcels where mixed-use (commercial and residential) is desired. CMX-2.5 prescribes a 55’ height limit and would ensure a maximum building height more consistent with most adjacent neighborhoods. At some parcels where taller development is appropriate, the new CMX-3 may be the most appropriate classification, due to the absence of a height limit, but with density controlled by a base F.A.R. of 500%. To emphasize the principles of the Master Plan to make it “real Philadelphia”, the underlying zoning classifications of adjacent residential neighborhoods should be extended eastward to the adjacent riverside development parcels, to continue the scale of the urban fabric to the waterfront.</p>	5	Text in the final plan has been edited to reflect the recommendation that the City Planning Commission complete zoning remapping for the waterfront as soon as possible after the Planning Commission adopts the plan. DRWC will advocate for the City to take this action.
14	<p>Comment from CDAG: Massing Controls Recommendation: Require “step backs” adjacent to trails, access points, and view corridors It is not clear how the Master Plan will work to prevent a claustrophobic, “cavern” effect when large buildings abut the waterfront trail, setback, and connector streets. CDAG recommends the zoning component supporting the Master Plan include massing controls in the form of a “step-back” or “wedding cake” formula to prevent structures from overwhelming the trail, setback, and river-access areas. CDAG also recommends that the Sky Plane Controls of the proposed new Zoning Code be employed to manage massing of taller structures and preserve view corridors along the waterfront.</p>	3 / 5	Text in the final master plan has been edited to be more clear about this topic, but building setbacks are controlled by zoning, and therefore the Planning Commission. The intent for the plan is not for a “cavern” effect, and therefore DRWC will advocate for this when the Planning Commission considers zoning for the waterfront

15	<p>Comment from CDAG: Height Limits Recommendation: Allow CDAG to review height-exception criteria The Master Plan allows structures higher than the standard three, five, and eight-story district controls. Excess height limits are proposed to be based on certain criteria, rather than on mapping specific parcels. This is a sensible approach, but it puts tremendous pressure on the criteria, which, if not written properly, could lead every property owner to seek height exceptions or challenge the legality of the standard height limits, rendering the Master Plan moot. These criteria must be specific, legally defensible, and allow for no deviation. CDAG respectfully, but strongly, requests to see these criteria as soon as possible.</p>	3 / 5	Text in the final plan has been edited to more clearly provide criteria under which height may be appropriate on the waterfront. The Planning Commission will have to make the final decision on they consider zoning policy for the waterfront.
16	<p>Comment from CDAG: Historic Preservation Recommendation: Make use of the new zoning code’s preservation language The Master Plan lacks substantive language that would enable the preservation and showcasing of the Philadelphia waterfront’s rich colonial and industrial history. CDAG suggests that the zoning component of the Master Plan mimic the frequent reference to the Historic Preservation Chapter 14-1000 of the latest version of the New Zoning Code Draft Proposals.</p>	3	Text in the final plan has been altered to reflect this language. Thank you for the valuable comment.
17	<p>Comment from CDAG: Nuisance Uses Recommendation: Ensure Night Club uses do not proliferate Because the Master Plan process pre-dates the creation of the City’s new Zoning Code, it is CDAG’s understanding that the Master Plan and Master Plan Report will not contain remapping recommendations that use the new Code’s zoning classifications. For this reason it is unclear whether, and to what extent, the Master Plan’s recommendations will allow or prevent Assembly and Live Performance uses, i.e. nightclubs, as a matter of right. Because the proliferation of such uses could undermine the entire Master Plan (and quality of life in waterfront areas), CDAG recommends that specific language be included in the zoning component supporting the Master Plan to specifically limit or disallow these uses within the district.</p>	3 / 5	Text in the plan has been slightly altered to indicate that the intention for the plan is that the waterfront be an active and vibrant place during the day and at night. However, in no cases is the plan recommending that nuisance uses be proposed for the waterfront. There should be night life, not nuisance night clubs. These uses must be regulated through the following three controls: <ol style="list-style-type: none"> 1. Land use and zoning 2. Liquor licenses 3. Law enforcement DRWC will advocate that all of the above be utilized in regulating these types of uses.
18	<p>Delineation of Submerged Lands Master Plan uses the term “riparian rights;” correct term is “submerged lands.” These lands are owned by the public and held by the government as trustee for the benefit of the public. I question whether the planners have sufficiently explored the possibility of advocating for a broad legal definition of submerged lands. If, either through the administrative or judicial branches of government, we can establish the maximum delineation of the submerged lands, then we could obtain more control in pursuing the goals of the Master Plan. At a minimum, the Master Plan should include a map showing the delineation of the submerged lands.</p>	3	The plan has been changed to properly use the term “submerged lands” when discussing legal rights. The term “riparian” also has a landscape architecture and ecological meaning, so it has been preserved in that context. Submerged lands vary from property to property and it was not the scope of this plan to map this on the entire waterfront.

19	<p>It is contrary to the public interest to have predatory gambling in the study area (government-promoted gambling products contained in casinos and marketed by casinos). We do not want to attract this sort of “attraction” in the study area. I request that the Master Plan express value judgments about casinos in the study area.</p>	8	<p>The plan will not express a value judgment about gaming on the waterfront.</p>
20	<p>My primary concern is the proposed density & height. It doesn’t make sense – for Philadelphia, or for any great waterfront city. Massing buildings so the street frontage is in scale with the neighborhood is good planning, but limiting the height of the taller portions to only +/-8 stories, and suggesting much of the future development only be 3-4 story row houses is not visionary at all. Look at Chicago, Boston, the east side of the East River in New York, even London. These great cities are developing waterfront buildings that have “bases” that are in a neighborhood scale, but have taller portions set back and rising out of the base. People want to be near the water, but they also want to see the water, as well as the new parks that will be created, and they want to have dramatic skyline views. That is the appeal of waterfront development. Also, maybe most important of all, the proposed restrictions will lead to developer after developer going to city council to get zoning changes, and we’ll be back to square one. Let’s think a bit bigger.</p> <p>It has also been suggested that one reason for the proposed lower density and height is to control land speculation. Although admirable, there are other ways to force developers to build what is allowed or proposed without flipping while still allowing higher densities. Land value taxes are a better tool to control speculation than height restrictions are. Plans of Development, or version of them, that tie development to approvals also control speculation. There are several tools that could be used, so please, let’s not sacrifice an exciting urban environment just to stop speculation.</p>	8	<p>There are many opinions about the appropriate density and height for the waterfront. The plan was carefully formulated using economic analysis and best judgment of the experts on the team to make recommendations on this topic; however it is recognized that individuals may have alternate opinions that are valid.</p>
21	<p>Another issue is the elimination of the big box retail stores. The designs of the current shopping centers on South Delaware Avenue are embarrassing; however, their need is practical. Instead of just suggesting they disappear or relocate elsewhere, why can’t it be proposed that they are phased into a more-urban friendly design? Like a series of hybrid buildings with large first floor retail, rear parking garages, and upper floor residential? This building type exists throughout the country and would be a more realistic proposal.</p>	3 / 7	<p>It was not the intention of the plan to imply that the large format retail stores would be simply relocated to another place in the city. On the contrary, the intention was to absolutely reflect the suggestions in this comment. Text in the final plan has been altered to be more clear about this recommendation.</p>

22	<p>Finally, I think much of the concern and discussion about making the developments “realistic” and being able to control speculation have prevented the master plan from being the bolder vision that it wants to be. Multiple times in the June 13th Master Plan “unveiling” the design team showed images of Vancouver, but where is the boldness and greatness of Vancouver in this master plan? Where is the density? One of Vancouver’s successes is its density, which ranges along the waterfront from 75 to 150 units/acre. Battery Park City in NY is over 300 units/acre. This proposal would be around 30 units per acre? Are we maybe missing the boat?</p>	8	<p>Density on the waterfront has been recommended based on projections completed by the Planning Commission in the Philadelphia 2035 plan. It is possible that Philadelphia could grow more rapidly than what is projected in this city-wide plan; however, for the purposes of the master plan, the team did not think it wise to over-estimate the absorption potential (and therefore the density shown in the plan).</p>
23	<p>While we are specifically mentioned in the report and while renderings have been made of our properties, we were not included in any meaningful way in the dialogue or process for developing the Master Plan. Given our stakeholder position, our involvement lacked both quality and quantity.</p>	8	<p>DRWC held numerous meetings with this landowner and his representatives.</p>
24	<p>The Master Plan, as currently drafted, puts the four Anderson properties in a “development limbo,” meaning a state of affairs where plans previously developed for the Anderson properties and permitted for zoning by the City are not recognized by either the DRWC or its consultants as having any validity or standing. Moreover, it ignores the third principle for the development of the Plan – “Accommodate diverse land uses along the waterfront – protect and enhance the industrial uses at the south and north ends.” These plans, developed as a matter-of-right under “G-2” zoning, include a comprehensive expansion/relocation of Anderson’s core business. In our view, the Plan lacks the vision to allow market forces to adapt to inventive development of these parcels.</p>	7	<p>The draft plan included a note that the plan recognizes that there may be existing entitlements on property that are not shown in the plan. However, text was added in the final plan to further emphasize this point, particularly for the Anderson property.</p> <p>The plan recognizes that there are several potential reuses of the Anderson property, including industrial use, which Mr. Anderson currently has the permits and right to do on his property. The plan shows a variety of uses for the future which could increase the value of the property from its existing G-2 use. The intentions shown in the master plan will be implemented through the Philadelphia City Planning Commission’s drafting of and recommendations for base zoning districts and overlay ordinances for the project area, including the Anderson property.</p>
25	<p>The plan contains an excessive emphasis on a regulatory approach to zoning that appears inconsistent with recent actions by the City Planning Commission, City Council, and the Mayor.</p>	8	<p>Not sure what is meant by this comment. DRWC consulted with the Planning Commission and the Zoning Code Commission when making general zoning recommendations for this plan. This plan merely indicates certain broad intentions that will need to be turned into zoning policies by these city agencies following the plan’s adoption by the Planning Commission.</p>