



September 21, 2018

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

Dear Ms. Sharpe:

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

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

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

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

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

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

THRIVE

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


CONNECT

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

RENEW

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

Sincerely,



Lori Salganicoff
Executive Director

cc: Councilwoman Cindy Bass
Laura Spina, Ian Hegarty, Matt Wyson, Philadelphia City Planning Commission

COMMENTS TO THE UPPER NORTHWEST DISTRICT PLAN FINAL DRAFT

Submitted by the Chestnut Hill Conservancy

September 21, 2018

Pre-amble, history page: INSTITUTIONS

Request for added language:

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

Page 4: HOMEOWNERSHIP

Request for added language:

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

Page 7: CONNECTIONS AND SAFETY FOR CYCLISTS AND PEDESTRIANS

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

Page 8: TIMELINE

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

Page 9: TREE COVER

Request for added language:

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

Page 10: HISTORIC SITES AND ASSETS

Request for changed language in intro:

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

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

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

CHESTNUT HILL HISTORIC DISTRICT

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

Page 13: HISTORIC PRESERVATION

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

LANDSCAPE CONSERVATION

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

Please change “purchasing easements” to “securing easements” It’s more accurate

STRONG COMMUNITY COHESION TODAY

Request for added language:

“The Chestnut Hill community uniquely organizes its RCOs through one ‘Convening RCO,’ managed by the CHCA, to better coordinate community responses.”

Page 16: EXISTING LAND USE

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

Page 19: EXISTING ZONING

Request for added language:

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

Page 22: THRIVE

Request for added language:

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

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

Page 25: HOUSING

Request for added language:

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

CH Conservancy Comments to the Upper NW District Plan Final Draft

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

Request for added language:

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

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

Page 27: INFILL and LIMITED GROWTH AREAS

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

Page 31: GOOD DESIGN IS GOOD BUSINESS

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

Page 41: UTILITIES

Request for added language:

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

Page 46: FLASH FLOODS

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

Page 47: TOOL BOX: FLOOD MITIGATION

Request for added bullet in Planning and Policy:

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

Page 48: RENEW

Request for language to intro:

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

Page 50: NEIGHBORHOOD PARKS AND RECREATION

Request for added language:

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

Page 51: WATER QUALITY

Request for added language:

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

PROPOSED WISSAHICKON OVERLAY EXPANSION:

Request for added language:

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

TREE COVER

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

Request for added language:

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

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

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

Request for added language as paragraph 3:

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

CH Conservancy Comments to the Upper NW District Plan Final Draft

Request for added language at end:

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

PRESERVATION STRATEGY TOOL BOX

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

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

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

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

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

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

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

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

Page 60: OPEN SPACE

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

APPENDIX

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

Comments on Recommendations

THRIVE

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

CONNECT

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

CH Conservancy Comments to the Upper NW District Plan Final Draft

18. *Change language:* Design and ~~build~~ implement safety improvements to reduce ~~crashes~~ accidents and pedestrian vulnerability throughout district in ~~High Injury Network~~ locations.
19. –
20. *Add language to the end:* “and commercial corridors”
21. –
22. *Add language:* “Install new crosswalks on Germantown Avenue to improve pedestrian safety, especially in areas with... ”
23. –
- NEW. Review use of streets in areas where current use by public transportation creates a safety issue.
24. –
25. –
26. *Add language:* “Install fiber optic cable underground along...”
27. –

RENEW

28. –
29. –
30. –
31. –
- NEW. Support sustainable use of the Water Tower Recreation Center and others throughout the district.
32. –
33. **MAKE PRIORITY** *Add bullet point:* “Create other curbs to development on environmentally sensitive watershed land.” Add nonprofits to “Implementing Agencies and Partners.” Change “Support conservation easements...” bullet to add “, including recognition of reduced value of undevelopable land,”
34. An important recommendation across the entire district. Replace ~~Germantown~~ with District
35. Add PECO, other agencies, nonprofits to “Implementing Agencies & Partners”
- NEW. Celebrate and help to retain healthy heritage trees and support planting of future heritage trees throughout the district.
36. **MAKE PRIORITY!** *Change language to:* “Create regulatory, financial, and other incentives for reuse of historic properties. Encourage ~~Allow~~ a wider range of uses, additional housing units, and relaxed size dimensional requirements for properties listed.. .” Add nonprofits to “Implementing Agencies & Partners”
37. Add Nonprofits and City Council to “Implementing Agencies & Partners”
38. Add bullet point: “adopt local financial and dimensional incentives that support current federal, state and other existing incentives”
39. –
- NEW. Utilize and support other tools to protect significant resources including conservation districts (in conjunction with preservation of individual resources), demolition moratorium, preservation easements, or (if created)

CH Conservancy Comments to the Upper NW District Plan Final Draft

preservation districts.

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

Comments on PROPOSED ZONING, page 86

CORRECTIVE ZONING

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

ZONING TO ADVANCE THE PLAN

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

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

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