



November 12, 2008

Councilman Frank DiCicco
City Hall
Room 332
Philadelphia, PA 19107

RE: Bill 080741 and Bill 080742

Dear Councilman DiCicco:

We are writing about the above legislation which will rezone the area between 10th and 11th Street, Market and Filbert Streets from its current designation of C5-Commercial to Commercial Entertainment District (CED) and amend the section of the Zoning Code that defines the regulations of the CED classification.

The Design Advocacy Group's mission is to advocate for high quality planning and design in Philadelphia. We are therefore limiting our comments to these issues and will not address the other significant concerns that have arisen from the proposal to introduce gambling to the area.

We commend the City on the leadership it has demonstrated so far to protect Philadelphia's interests in relation to the siting, planning, and design of the proposed casinos and we applaud the on-going attempt to realize high design standards within a constricted time frame and in the face of limited legal options and increased political and economic pressures.

It is a measure of the City's success to date that we have the opportunity to consider a non-waterfront site for one of the casinos, but whether the Gallery site for Foxwoods is actually preferable to the waterfront still needs to be evaluated. As it was with the other sites, the location of a casino at Market Street East will have an enormous design impact on the design and planning future of our City. The people of Philadelphia deserve good planning and design – better than has occurred in the recent past – based on a meaningful dialogue about the relevant issues. It will be impossible to support this site or proposal without first reviewing the proposed design. For that reason we are eagerly awaiting the open and inclusive process that we understand the Planning Commission is about to undertake, including informational meetings to present the public with the background needed to evaluate Foxwoods' forthcoming plan of development; public meetings for review of the design at meaningful milestones; and the concurrent development of an updated master plan to help the City determine whether a casino could contribute to the improvement of this long-underperforming but critical portion of our downtown.

That said, we are disturbed by two issues:

First, the accelerated schedule for the approval of the legislation has provided insufficient time for meaningful public review and comment. Even a slight delay in the schedule would help ensure that the legislation benefits from thoughtful consideration from all points of view. It would also help negate the unfortunate – and, we hope, false – impression that the City government has already made up its mind about the Gallery location. DAG enthusiastically supports the administration's pledge to bring openness and integrity to the development process and such a rapid schedule for an important zoning change does not help us reach this goal.

Second, DAG is apprehensive about the signage regulations for the Market Street East area under the revised CED legislation. Although more restrictive here than outside the Market Street East area limits, the legislation would allow far larger signs, including rooftop signage, than is allowed under the existing C-5 Zoning. Although we have had no time to study the design consequences of the proposed legislation, some of our members believe the effect of large signs in a dense, urban area could be detrimental while others sense a design opportunity. We do not think that the current legislation is the best place to resolve this issue.

Urban signage is an important design matter and should be subject to rigorous design review. We believe that it will be difficult for the Planning Commission to exercise proper review over signage in a plan of development unless supported by more restrictive legislation. We therefore urge you to alter the proposed bill to permit signage in the East Market Street CED only as allowed under the existing C-5 zoning. This will permit the Planning Commission to review proposals for unusual or additional signage such as may be appropriate for a casino based on design quality rather than legislative right.

Thank you for your consideration.

Sincerely,

Joanne Aitken, AIA
Chair, Design Advocacy Group
c/o KieranTimberlake Associates LLP
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Philadelphia, PA 19130

cc: Brian Abernathy, Director of Policy and Public Affairs, Councilman DiCicco's Office
Anna Verna, Council President
Terry Gillen, Executive Director, Redevelopment Authority
Alan Greenberger, Executive Director, Planning Commission

The Design Advocacy Group of Philadelphia is a volunteer organization whose nearly 1000 members come from a broad spectrum of disciplines and share an interest in design, development, and planning. DAG's mission is to encourage public discussion about design and to advocate for design excellence.