



To Whom it May Concern:

EFNC would like to express our gratitude for the hard work that has already been put in during the planning process. While we appreciate the process and you giving us the opportunity to participate, we have real concerns with some of the outcomes.

EFNC has conducted an extensive evaluation of the Eastwick Public Lands Strategy (EPLS) during five board meetings and one public meeting. EFNC evaluated the outcomes using a sustainability framework in which our goal was to address equity, environmental, and economic concerns for the community stakeholders.¹

EFNC began its evaluation process for the overall process as well as Sites 1, 2, and 3 by reviewing the principles articulated in the Roundtables (EPLS 9) and from those presented by Interface Studios (EPLS 13). EFNC then articulated a primary principle and a set of principles related to flooding that include (EFNC 11 and 12):

The overriding principle is that “PROTECTING RESIDENTS’ SAFETY MUST BE THE HIGHEST PRIORITY AND MUST BE AN ABSOLUTE REQUIREMENT BEFORE PROCEEDING WITH THE PROJECT”.

In evaluating the impact of the project on the community’s concerns about flooding, we looked at the following principal aspects of risk:

1. No increase in flood hazard risk;

¹ Note: In these comments, unless otherwise noted, slide references labeled EPLS refer to those included in the July 26, 2018, presentation and those labeled EFNC refer to those included in the October 25, 2018, public meeting.

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2. No net loss of flood storage;
3. No change in flood elevations;
4. No change in local flooding;
5. No adverse impacts on adjoining communities including the John Heinz National Wildlife Refuge at Tinicum (the Refuge); and
6. The burden of proof is on PRA before development could occur.

To evaluate these aspects, EFNC developed six framing questions for the evaluation (EFNC 22).

They include:

1. To what extent have economic, environmental, and social equity been successfully addressed?
2. Will development address Eastwick's issues and challenges?
3. Is it prudent to develop in Eastwick's FEMA-designated Special Flood Hazard Area (the 100-year floodplain), even if it is legal?
4. Are the right land uses proposed in the right places?
5. Who benefits and who pays the costs in the proposed strategy?
6. What do Eastwick residents get from the plan?

The comments are organized in the following three sections:

- A. Process;
- B. Individual PRA sites; and
- C. Next steps.

A. PROCESS

EFNC is confused about where we are, chronologically, in this process. While PRA has described the Eastwick Public Lands Strategy as a feasibility study, it looks and feels more like a plan for development. For example, Slide 6 shows the Planning Process indicating that we are in a refinement stage indicated by the "You are here" pin between "Review Draft Ideas" and "Review Final Plan." Slide 37 indicates that this is the 90-day public comment period before the Draft Feasibility Study is presented. EFNC has assumed that we are commenting on the "Final Plan" and this will be the last opportunity to comment before the feasibility study is submitted to the Philadelphia Redevelopment Authority Board for approval. In order to facilitate EFNC's understanding of this process, we ask that PRA commit to doing the following:

1. Please clarify if these are the draft or final recommendations and whether there will be additional opportunities to comment on the feasibility study.



2. Please clarify how decisions about the comments will be made and either rejected or incorporated into the Draft Feasibility Study.

3. Please clarify how decisions will be made about the refinements between the Draft Feasibility Study and the Final Feasibility Study.

B. INDIVIDUAL PRA SITES

1. PRA Site 1 (A, B, and C)

- i. EFNC believes that Site 1 would benefit from the inclusion of greenspace. As proposed, the development of Site 1 shows little community green space. Only a small public space bounded by 86th St., and the proposed extension of Lyons Place and two new streets is shown. There is no indication of what public input there has been or will be to the planning and design of this space. The large cut area between Parcels A and B would be in private ownership and required for management of stormwater. We are concerned that it would likely have limited public access and would therefore be unsuitable for community green space.
- ii. EFNC believes that the 100-year floodplain should not be filled to accommodate development. FEMA's Flood Insurance Rate Maps (FIRMs) have not been significantly modified since their initial adoption in 1979 even though they were reissued in 2007 and 2015. In a memo to EFNC in 2013, Licensed Geologist M. Richard Nalbandian states, "FEMA Flood Maps are outdated and inaccurate". They are based on rainfall data from the 1960's and do not account for newly available climate data which indicates the likely incidence of more frequent storms of much greater intensity."
- iii. Filling on Site 1 would likely violate one of EFNC's basic principles- that there should be "No net loss of flood storage." Because of the high water table, a large area of cut labeled "*green infrastructure for flood mitigation*" will likely fill with water, reducing the area's flood storage capacity.
- iv. Floodplain filling will likely violate EFNC's primary principle, "Keep residents safe." The Association of State Floodplain Managers states, "The "bottom line" is, if you fill in floodplain and reduce the flood storage area, you will likely cause more flooding and other problems in the homes and properties adjacent to it." The proposed project must



pose no increased flood risk to those living in the low-lying areas south of 84th St. The burden of proof should be on PRA to demonstrate that this will not be a problem.

Site 1 should be conserved as an extension of the Refuge. In the 2014 Community Assessment of 244 residents south of 84th St, 81% or 198 households indicated they would support the preservation of the Site 1 as an extension of the Refuge if funding were available. The majority of participants at the EFNC Public Meeting on October 25, 2018, reaffirmed their support for preservation and for pursuing negotiations with The Conservation Fund, a national conservation organization, which has indicated its willingness to purchase the Eastwick Tract and donate it to the US Fish and Wildlife Service.

- vi. The original Eastwick Urban Renewal Plan located light industrial uses in the Eastwick Industrial Area (EIA) to the north of Island Ave. The EIA is the appropriate place still for light industrial uses.
- vii. EFNC is also confused about the need for a levee behind new building noted on Slide 23. We ask for clarification on this point.

2. Site 2 (Corner of Heinz Refuge and 84th Street)

- i. The EPLS originally mentions using the site as a “gateway” to the Heinz Refuge but that idea appears to have been discarded.
- ii. There are several large affordable senior housing projects currently in Eastwick in the planning and design process. Is senior housing still a critical need? Is there current data that supports the purported need?
- iii. Should affordable senior housing be located closer to services such as Penrose Plaza? Early in the Interface Roundtable process, there was substantial attention given to the “walkability” of community design. Senior housing at Site 2 is close to the Refuge but far from the rest of the community (shopping, services, etc.).

3. Site 3

- i. EFNC currently opposes all development that would increase impervious surfaces on Site 3 because it is an ecologically-sensitive site and flood-prone. Developing Site 3



increases the risk of increased flooding and its potential impacts on residents living in Eastwick's low-lying areas.

- ii. Site 3 consists of three distinct land uses addressed in the EPLS.
 - a) The "Main Street" along 84th St will be significantly elevated above the street. Along 84th St. the current elevation at Grovers Lane is +4-6 and in front of Pepper is -2-0. (Topo model from 9-27-17 Interface presentation). Since first floor elevation must be above the Base Flood Elevation of +10, it will be minimum elevation +12. How will retail work elevated so high above the street?
 - b) The repurposing of Wolf School/CommTech could be a great benefit to Eastwick and represents a strong community asset. We see opportunity for senior housing, along with a community center, theater, or other agreed upon uses. Additionally, opportunity exists for regional recreation with gymnasium facilities and the ballfields could be relocated adjacent to the building for field-based athletics. However, The Wolf School presents the most glaring shortcoming of the outlined development process. Slide 32 states, "reuse the historic CommTech building as a community center, workforce/skills training for youth and adults, or affordable housing." Moving forward, how will decisions be made concerning the mix of uses, management structure, and operating entity? Who will be making these decisions? Slides 38-40 give no indications of meaningful public participation.
 - c) Pepper School, situated in the lowest point in Eastwick and often referred to as the Pepper Bowl, is incompatible with development. Development in this space would worsen flooding. Pepper sustained significant damage from water and mold and the EPLS clearly indicates that the facility is too costly to rehab. However, as it remains, it is dangerous and a beacon for short dumping. The plan calls for demolition, but would also consider bids to develop. The EPLS gives no indication of how long bids will be entertained for its redevelopment and Pepper allowed to remain abandoned. EFNC cannot support leaving the building abandoned without regular maintenance. A timeframe must be specified for action.



C. NEXT STEPS

The next steps are unclear. Slide 4 states: “The final deliverable is a research document so that the City with the community can make thoughtful decisions in public land development moving forward.” Slide 38, “The Long Road Ahead,” lays out the “road to development” with no indication of public participation. As laid out in this slide, the next steps are land surveys for individual projects, legal entitlements, and then RFPs. The following slide, “The RFP Process,” indicates one opportunity for public comment after the RFP has been issued and city agencies have preliminarily selected the developer. The developer then must include some type of public participation in the design and planning process. These slides contradict the study premise that it is a research document to enable the City and community to make thoughtful decisions in the development process. Meaningful public participation must be included in the planning and development phases before RFPs are issued.

On two slides, 23 (PRA Site 1) and 35 (PRA Site 3), a note on the drawing states, “Study Potential Use for Flood Mitigation.” There is neither a timeline nor any suggestion for implementation of flood mitigation measures.

D. CONCLUSION

EFNC sincerely appreciates PRAs efforts in developing this study. However, we are left with major questions and concerns about the options presented. EFNC has two primary concerns. The first is that the EPLS, as presented, appears to be a land development plan that is often in conflict with the goals and framing questions that formed our evaluation criteria. The second is that there appears to be little opportunity for meaningful public participation in major decisions as the planning and development process moves forward. The Eastwick community must be kept safe and have a voice in the planning, development, and preservation of the individual sites as the process moves forward.