



June 28, 2019

Jack Conviser RA AICP
City Planner - Urban Design Division
Philadelphia City Planning Commission
1515 Arch Street
Philadelphia, PA 19102

Re.: 2079-97 North 63rd Street
Zoning Application 950017 for Proposed 5 Story 111 Unit Mixed Use Apartment Building

Dear Mr. Conviser:

I am writing on behalf of the Overbrook Farms Club (OFC), the Registered Community Organization (RCO) in which the above-referenced property is located. We understand the proposed development for this site by Rock Construction and Development has obtained conditional zoning approval for a large mixed-use development, to include the demolition of existing single-story commercial properties and construction of a 5 story 111-unit apartment building with first floor retail fronting 63rd Street together with 43 off street parking spaces.

As part of the Civic Design Review process, a community meeting of the residents of Overbrook Farms was co-convened on June 24 by the City Avenue Special Services District and OFC, and was attended by 53 residents, as well as representatives from the offices of Councilman Curtis Jones and Representative Morgan Cephas and the leadership of the 63rd Street Business Association. Rock Development had not reached out to or engaged our community prior to the above-referenced meeting, and as a consequence the project's unveiling was met with a great deal of concern. Though we know it is not the desire of the applicant, we feel we need a continuance of the Civic Design Review process in order to collaborate more with Rock to the better interests of both parties.

In general, the OFC and community are very supportive of development on this site. There is general agreement that a mixed use development would contribute significantly to the commercial corridor and overall amenities of the neighborhood. However, there are a number of acute concerns we have about the general design and intended use of this development.

1. While the scope and scale *might* be supported by this location and in the context of the rest of the fabric of the street, its current general massing and situation raise significant concerns relative to the scale and disposition of immediately adjacent buildings, both commercial and residential.
 - a. Light Access: The interior light wells are not sufficient, we feel to let light into the development itself and the fact that the structure closely abuts neighboring properties will severely diminish natural light access.
 - b. Setback: While zoning may require no set back on the 63rd Street front, the sheer vertical massing of the structure places it starkly out of scale with its immediate street scape. Even though there are large apartment buildings of similar mass in the near vicinity, they have significant setbacks and transitional green space. We would advocate for more street-level green and civic space in front of the foreseen ground-level commercial spaces and/or a design in which the commercial storefronts are more on the 2 to 3-story scale with the rest of the street, with

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the higher rise of the residential parts of the building set back from the commercial facade. We need to keep in mind that 63rd Street is not a traditional commercial corridor; it is interrupted by and directly across the street from historic, owner-occupied, single-family houses.

- c. Parking: We feel the specified 43 parking spaces are greatly under-estimated for *any* residential use or commercial use. The hypothesis that this will be a “commuter” building is not supported by the experience of our neighborhood. Despite Overbrook Farms’s history as a commuter community built around the SEPTA regional rail, current residents (transient and permanent alike) are still very car dependent; residents may use the rail heavily, but they also keep at least one car. For example, the recent rehabilitation of 6300 City Avenue originally intended a second apartment building (new construction) adjacent to this historic building. The developer aborted the second development owing to lagging demand, *and* converted the lot next to the building to parking for tenants, owing to the primacy of demand for parking within the rental market. Finally, lack of adequate parking on 63rd Street has been a barrier for decades to greater commercial activity on the corridor, which may threaten patronage of certain kinds of business tenants for the intended commercial spaces for this development.
2. Despite the developer’s assertions to the contrary, we feel the residential layout of the development bespeaks almost entirely a student market, given the small size of the units and over-ponderance of bathrooms per unit. We do not feel additional student housing is in the planning interest of this residential neighborhood. We would support more long-term tenant or condominium-based development, but have been working hard to stave student housing in Overbrook Farms. This is coherent with St. Joseph’s University’s plan to pull their student housing more central to their campus, thus making more student housing at this location incoherent with the overall planning trajectory of our neighborhood and its institutional neighbors.
3. We welcome the street-level commercial spaces, but would welcome a more community-centered process on the disposition of those spaces and intended tenant business types to ensure robust local patronage, *and* to be coherent with the developing vision of the 63rd Street Business Association.
4. Finally, aside from the regulatory oversight provided by the Streets Department, L&I, and other regulators, we would like to see a plan for how construction impact will be mitigated with respect to noise, vibrations, lay down, traffic patterns, and other matters, given the close proximity of legacy business and other residential buildings.

In sum, we welcome a development at this site, but would request a more community-centered process, given the scale and scope of what is being proposed. We are happy to work closely with Rock Construction and Development to achieve both its business and our community’s goals. We are grateful to the City Planning Commission for its support in facilitating that process.

Warmest regards,



Thaddeus Squire
President, Overbrook Farms Club

CC: Board of Directors, Overbrook Farms Club
63rd Street Business Association
Overbrook West Neighbors
Office of Councilman Curtis Jones
Office of Representative Morgan Cephas

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