

To: The City of Philadelphia Zoning Board of Appeals (ZBA)
From: Christopher Puchalsky, Ph.D. 
CC: Council President Darrell Clarke, Deputy Managing Director Michael Carroll
Date: 16 November, 2020
Re: 1501 N. 33rd Street – Zoning Appeal – Proposed Driveway

Introduction

This letter regards a proposed two-way 24'-00" curb cut included in the zoning submission for a multi-family development at 1501 N. 33rd Street. It is written on behalf of the City of Philadelphia Office of Transportation, Infrastructure, and Sustainability (OTIS).

After reviewing the City of Philadelphia's Complete Streets Design Guidelines (2017) as well as additional factors such as proposed bicycle network facilities and crash history along this section of N 33rd Street, our office does not support the installation of a driveway at this location as part of this development.

Complete Streets Design Guidance

Per the City of Philadelphia's Complete Streets Design Handbook (2017) Chapter 4, Section 8.1 Driveways:

"Driveways should be limited on streets with significant pedestrian and vehicular traffic, in order to minimize the potential for conflicts and collisions."

This segment of N. 33rd Street fits the description above, as a street with high vehicular traffic. N. 33rd Street between Girard Avenue and Cecil B. Moore Avenue (SID 0100 to SID 0110) is a State Route (SR 13). Per PennDOT's AADT history, this roadway segment had an AADT of 20,880 vehicles in 2018. This is considerably higher than an average Philadelphia street.

For context, other PennDOT facilities in Philadelphia with similar AADTs include Penn Square around City Hall, South Broad Street between Washington Avenue and Passyunk Avenue, the Grays Ferry Avenue Bridge, Island Avenue between Lindbergh Boulevard and Elmwood Avenue, and Cobbs Creek Parkway between Woodland Avenue and S. 70th Street.

Because N. 33rd Street carries as much or more traffic than some of these major arterials, it cannot be treated as a standard Philadelphia street and is subject to the limitations recommended in the Complete Streets Design Handbook cited above.

Bicycle Network Planning

N. 33rd Street has been identified as a crucial link in the City of Philadelphia's High-Quality Bicycle Network plan. Due to its proximity to Fairmount Park and the key connection it serves, as well as the high vehicle volumes, N. 33rd Street is a candidate for a protected or parking-protected bike lane sometime in the future.

Protected and parking-protected bicycle facilities require mixing zones at driveways. These mixing zones reduce the quality of the bicycle facility and increase bicycle-vehicle conflict points. Roadways identified as high-quality bicycle network connections and/or as future protected bicycle lanes are therefore priority locations on which to limit unnecessary driveways.

Crash History

Although this section of N. 33rd Street is not on the City of Philadelphia's High-Injury Network (HIN), there were nine (9) crashes on it between 2016 and 2018. While none of these crashes resulted in a fatality, they all resulted in at least one injury.

An unusually high proportion of the crashes on this roadway were sideswipe crashes. Between 2016 and 2018, only 13% of all reportable crashes in the City of Philadelphia were sideswipes. On this section of 33rd Street, sideswipe crashes account for 44% of all reportable crashes. Although we have not examined the crash reports for these sideswipe crashes, this outside representation suggests that drivers traveling along this section of N 33rd Street are passing carelessly, or that sightlines and other roadway factors are causing them to drive outside of their lanes unintentionally.

In either case, adding a driveway to this location given these crash patterns and the high vehicle volumes is inadvisable.

Zoning Considerations

Were this parcel zoned in such a way that accessory/on-site parking were required, our office would consider working with the Streets Department and the Developer to determine how a driveway could be incorporated into the site in a way that minimizes danger to all roadway

users in the context of N. 33rd Street's high vehicle volumes. In this case, however, the developer is adding accessory parking despite its prohibition for a stated purpose that is unsubstantiated.

Per the letter provided by Horner & Canter Associates, dated March 9th, 2020:

"... the provision of off-street parking for this project will have a positive impact on the surrounding area by removing cars from the street and reducing the likelihood that tenants of the building will circulate the roadway system looking for available on -street parking."

There is no indication that on-street parking is limited in the vicinity of the development, which is the only reason tenants would circulate the roadway system to any abnormal degree. To the contrary, both aerial and street view imagery from 2018 and 2019 indicate that street parking is generally available along the entire block frontage, with the exception of some garage entrances a few parcels north of the development in question, as well as on nearby blocks of Oxford Street.

The assertion that providing accessory parking despite the zoning code due to the likelihood that residents will have to circulate the roadway system is therefore unsubstantiated by the conditions on the ground.

Conclusion

Based on the analysis and background information provided above, our office cannot support the placement of a driveway in this location. This section of N. 33rd Street is not a typical Philadelphia roadway and cannot be treated as such.

We recommend that the Zoning Board of Appeals uphold the initial zoning refusal and not issue a variance.