



CITY OF PHILADELPHIA

OFFICE OF THE HEALTH COMMISSIONER

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Palak Raval-Nelson, PhD, MPH
Health Commissioner

January 8th, 2025

VIA EMAIL

Lawrence Brunt, P.E.
Arcadis U.S., Inc.
2100 Georgetown Drive, Suite 402
Sewickley, PA 15143
Larry.Brunt@arcadis.com

RE: City Comments on the Alliance 51st Street Public Involvement Plan for 1646 South 51st Street, Philadelphia, PA 19143

Dear Mr. Brunt:

Following review of the draft Public Involvement Plan (PIP) submitted by Alliance 51st Street LLC (Alliance) to the City of Philadelphia (City) on December 4th, 2024, the City submits the following comments on the PIP:

1. The City recommends the inclusion of the date and location of the most recent Hexavalent Chromium release within the *Site Location and History* section of the PIP. This will provide important context for proposed PIP activities to community members.
2. The City recommends the use of alternate sites for the public meeting and document repository. The Walnut Street West Library is over 1.5 miles from the site and is not easily accessible by public transit for individuals with limited mobility. Specifically, there is no direct bus route from the site to the library and attendees would have to walk over 0.25 miles from the nearest trolley station. In addition, parking around the library is very limited. Potential alternative locations for the meeting and repository include Bartram's Garden or the Bartram's Housing Development. Both are within walking distance of the site, have available parking, and are widely accessible to residents living in the neighborhood immediately surrounding the Alliance property.
3. The City requests the publication of an online repository to increase accessibility of project documents. Given that Alliance 51st has proposed the use of an online meeting platform, an online database would ensure that all residents participating in PIP activities, whether virtually or in-person, have easy access to relevant information. .

4. The City requests a copy of any documents housed in the repository be sent via email to LeighAnne.Rainford@phila.gov.
5. The City requests that activities and documents be presented in an accessible format to account for the diverse members of the public. This may include using plain language summaries of important information and translation of printed materials and live events. Spanish, Arabic, and French, Haitian or Cajun, are common languages in this area.
6. The City recommends that community feedback on proposed remediation methods be legitimately considered and included in final site plans. The City also recommends that community concerns be addressed both at community meetings and in comment-response documents. True public participation occurs when affected parties, including residents, are meaningfully included in decision-making processes, and not merely informed of decisions after they are made.

We appreciate your consideration of these suggestions and look forward to reviewing the next iteration of the PIP. Please forward any questions regarding these comments to Leigh-Anne Rainford.

Sincerely,



Palak Raval-Nelson, PhD, MPH
Health Commissioner
Philadelphia Department of Public Health

cc: Leigh Anne Rainford, MPH, Program Administrator of Food Protection and Environmental Engineering, Philadelphia Department of Public Health
Aurora Trainor, MPH, Environmental Justice Coordinator, Philadelphia Department of Public Health
Jane Hwang, Deputy City Solicitor, Philadelphia Law Department
India McGhee, Divisional Deputy Solicitor, Philadelphia Law Department
Councilmember Jamie R. Gauthier, 3rd District, City of Philadelphia
Maitreyi Roy, Executive Director, Bartram's Garden
Lisa Strobridge, PG, Local Government Liaison, Pennsylvania Department of Environmental Protection
Amani Reid, Eastern Regional Coordinator, Pennsylvania Department of Environmental Protection
Ms. Crystal Yates-Gale, MBA, Deputy Managing Director