



January 31, 2023

Mr. Sean J. Park  
Director  
Office of Economic Development  
Louis L. Redding City/County Building  
800 N. French Street, 3rd Floor  
Wilmington, Delaware 19801

RE: South Market Street Master Plan

Dear Mr. Park,

The Southbridge Civic Association, Southbridge Community Development Corporation, and the South Wilmington Planning Network thanks you for the opportunity to provide comments on the South Market Street Master Plan's Environmental Impact Assessment.

We are always excited to see fresh redevelopment in South Wilmington, provided that the development is both socially equitable and environmentally sustainable, and in keeping with the recommendations of the Southbridge Neighborhood Action Plan (SNAP). To that end, we offer the following as comments, in no particular order:

1. The five day (three business day) lead given for public notice for the December 14, 2022 public workshop was far too short. In keeping with EPA guidance, we suggest at least a 15-day notice period, but preferably a 30-day notice period, with reminders in weeks leading up to the next event.
2. Provide all materials presented at public workshops on the project's website, along with instructions on how to submit public comments. An overview video presentation of the material presented can easily be uploaded there as well. Not everyone will be able to make it out to future meetings!
3. Attend future Southbridge Civic Association (SBCA) and SWPN meetings to provide project updates.



4. The direct and greatest beneficiaries of this project will be existing and future Riverfront East residents. Its equity benefits were overstated in the RAISE application, due to an overly coarse analysis of Census data which mostly captured disadvantaged residents from neighboring communities, such as Southbridge, in the “project area.” We understand that there may be a presumption that the RAISE funds will tangentially benefit residents in those disadvantaged communities included in the Census data used, but we feel that applying for funds under the pretense that those communities are in the “project area” is disingenuous. It is not clear to us exactly how those disadvantaged communities will benefit beyond opportunities to use the riverwalk or shop at new storefronts, as much of the planned design for mixed-use development - to our knowledge - is not directed at current residents of the disadvantaged communities but is meant to attract new residents to the area. Alternatively, we encourage the use of finer, block level Census data and point level home price data in future funding applications to account for Wilmington’s sharp and growing racial and class spatial divides. Doing so would show that the Christina Landing area is both majority White and higher-income.
5. In order to have social equity benefits, the project could address the following:
  - a. Provide improved, pedestrian level lighting along A Street between Market Street and Bradford Street. The existing and planned trail connections through the Southbridge Wilmington Wetland Park are good, but they are meandering daytime connections. A Street is and will be the only 24-hour walking and biking connection between Southbridge and Riverfront East, in lieu of failing to extend New Sweden Road to Church Street, as originally planned.
  - b. Advocate for the extension of the planned shuttle route between the train station and South Market Street to Southbridge (SNAP Recommendation IM 01). This would provide improved bus headways to the Downtown and Riverfront for transit dependent Southbridge residents.
  - c. Ensure that 20% of all newly built residential complexes with 10 or more units in the Riverfront are affordable for households making 30% or less of the area median family income as defined by HUD with priority given to applicants who previously lived in or currently live in Southbridge. At least 30% of these affordable units should have two or more bedrooms (SNAP Recommendations AL 02).
  - d. Advocate for the establishment of a Tax Increment Financing District encompassing all of South Wilmington with 80% of the funds being invested into an anti-displacement fund for Southbridge residents (SNAP Recommendation CE 05).
  - e. In Riverfront developments in South Wilmington, allocate 25% of retail space to rent out at below market rents to Black and Hispanic owned businesses (SNAP Recommendation ER 14).



6. This project should also consider and mitigate traffic and environmental impacts (such as flooding and future sea-level rise) of major Riverfront East developments beyond the very immediate study area. For example, the vast majority of vehicular traffic along South Market and Walnut Streets is through traffic into and out of Downtown Wilmington. Will these roadways have enough capacity to handle the existing traffic and the many thousands of new Riverfront East residents and workers, the majority of whom will likely travel by car? Or will some through traffic shift onto other streets, such as New Castle Ave. and Heald St. in Southbridge, as these motorists find their commutes slowed by the development and associated traffic calming along South Market and Walnut Streets? Such future diversions would constitute an unfair burden on a neighboring underserved community as a result of this project.

Thank you again for the opportunity to provide comments. Should you have any questions or concerns, please contact us at: [SouthWilmingtonPlanningNetwork@gmail.com](mailto:SouthWilmingtonPlanningNetwork@gmail.com).

Sincerely,

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Interim Executive Director, Southbridge Community Development Corporation

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Britt Salen  
Co-Chair, South Wilmington Planning Network

CCs: Michael Regan, EPA Region 3; Doug Atkin, FHWA Delaware Division; Nicole Majeski, DelDOT; Mayor Mike Purzycki; Meghan McGlinchey, RDC; Senator Darius Brown; Representative Frank Cooke; Councilmember Penrose Hollins; Councilmember Michelle Harlee