



United States Department of the Interior

NATIONAL PARK SERVICE
INDEPENDENCE NATIONAL HISTORICAL PARK
143 S. 3rd Street
Philadelphia, PA 19106



IN REPLY REFER TO:

**Statement Before the Architects' Committee
of the
Philadelphia Historical Commission
July 24, 2020**

RE: 232-36 Walnut Street

As an abutter to the subject property, the National Park Service as Independence National Historical Park (Independence NHP), a federal historic district, wishes to comment on the subject application. The project proposes to demolish 232-36 Walnut Street and to construct a 15-story building 184 feet tall. The building in question is not contributing to the Society Hill Historic District [SHHD] but is within the district that was listed on the National Register of Historic Places in 1971 and on Philadelphia's Register of Historic Places in 1999, developed in tandem with Independence. Portions of Independence NHP as well as the Thaddeus Kosciuszko National Memorial, which we also own and manage are located within SHHD's boundaries. The project would directly affect federal property.

Independence National Historical Park includes a World Heritage Site, Independence Hall, and five National Historic Landmarks (the Merchants' Exchange, the First Bank of the United States, the Second Bank of the United States, Carpenters' Hall and Philosophical Hall). Other nationally significant sites within our 55+ acres are Congress Hall, Old City Hall, Bishop White House, Todd House, and Franklin Court and its underground museum. The William Strickland-designed Merchants' Exchange Building is located directly across Walnut Street from the proposed project site. Across Third Street and a few yards north of the Exchange is the earliest purpose built federal building in America, the First Bank of the United States. The developer wishes to locate this project at the juncture of two internationally-admired historic districts that are thriving successes in neighborhood revitalization.

The National Park Service is opposed to this project because the new building is not compatible with the character of this part of the residential neighborhood, which consists primarily of 3 to 4 story dwellings with an open vista of sky above them. The proposed project will insert a 15-story, 184' structure directly across the street from a 3-story National Historic Landmark, the Merchants' Exchange Building.

Also, the deep excavation that this project requires carries potential to adversely affect or potentially damage the structural integrity of the Merchants' Exchange Building directly across the street. Such excavation should not proceed without an engineering study.

The National Park Service has supported Society Hill Civic Association's Neighborhood Plan currently under review by the City of Philadelphia. The plan includes a special area, Zone 3 in the existing Independence Hall Area Overlay District that would include the north and south sides of Walnut Street from Front to Fourth Streets and would have a 65' height limit. We strongly support this height limit as taller, more massive buildings such as the one under consideration today will contribute to the erosion of the edge of the historic district and open the door for similar out-of-scale development moving forward. We ask the Architects' Committee

to remain true to its historic preservation mission and support the existing historic districts that have worked so hard for so long to remain vital communities for our residents and visitors.

Thank you for the opportunity to comment on behalf of the many who work in and visit Independence National Historical Park.

Cynthia MacLeod
Superintendent