



SOCIETY HILL CIVIC ASSOCIATION

July 27, 2020

(Via email to Jon.Farnham@phila.gov)
Jonathan Farnham, Ph.D., Executive Director
Philadelphia Historical Commission
One Parkway, 13th floor
1515 Arch Street
Philadelphia, PA 19102

Re: 232-36 Walnut Street, Hotel and Event Space

Dear Dr. Farnham:

If time allows please forward this letter to the members of the Architectural Committee for purposes of tomorrow's meeting.

We support the recommendation of the Commission's staff that the application for a "Hotel and Event Space" be denied. Our reasons are as follows:

1. The massing and height of the proposal are out of scale for this location. This block face and the surrounding area are comprised primarily of 3-4 story buildings. The context is significant as there are cherished historic buildings in the immediate area, which form not just an important part of Philadelphia's tourism community, but also as a transition from the national park to the low scale residential neighborhood. Our high-rise buildings make Society Hill one of the densest neighborhoods in Philadelphia but those buildings were sited carefully as part of a comprehensive vision, heralded by many including the American Planning Association. This proposal violates that vision.
2. The dominant building is the Merchants Exchange Building, whose historic value cannot be overstated. The proposed building would loom over the Merchants Exchange Building. The image contained in the application (page A203) is misleading and does not accurately reflect how drastically the proposed building would impact the Merchants Exchange Building.
3. The Zoning Code would disallow the massing and other parameters of the proposed building. But, indeed, the Zoning Code is already too generous in this part of the City. The mismatch of zoning with historic preservation is a concept that was recognized generally by the City's Historic Preservation Task Force. Accordingly, the jurisdiction of the Commission is critical, until the zoning can be corrected.

4. A 65-height limit on this block is contained in comprehensive, largely corrective legislation currently pending in City Council, which, we believe, would have binding effect by now had it not been for the pandemic. We believe the bill will be considered by City Council hopefully in September 2020. Already, the massing and height violates the Society Hill Master Plan, which calls for a 65-foot height limit on this block and nearby blocks. That Plan was accepted by the City Planning Commission and, while not binding, should be considered by any reviewing board or commission.
5. The design of the proposed building is not appropriate. If the project proceeds, we can speak to those issues at a later time.
6. The proposal contains no understanding of how visitors or hotel guests for the 117 hotel rooms would be dropped off or where any would park, even as the proposal refers to more than 5,000 SF of entertainment space (a 2,000 SF restaurant on the 1st floor; a 2,500 SF indoor event space on the 15th Floor, and, by our estimate, a 1,118 SF outdoor event space on the 15th Floor that would overlook the Merchants Exchange Building). This suggests to us that the overall concept is not well planned.

In July of 2019, the PHC denied an application for a 240-foot high building on the adjacent property to the east. As reflected in the minutes, several members of the Commission opined that a building of 65-feet in height would be the maximum that would be appropriate; and no other member of the Commission stated otherwise. We believe that position is equally applicable to this property.

We are open to new development at this corner that would be consistent with its historic setting and the district. Today's proposal, however, is far from that mark. We respectfully request that the Committee issue a recommendation of denial.

Respectfully,

/s/

Paul Boni, Chair

Zoning & Historic Preservation Committee

cc: Larry Spector, President, Society Hill Civic Association