



# United States Department of the Interior

NATIONAL PARK SERVICE  
INDEPENDENCE NATIONAL HISTORICAL PARK  
143 S. 3<sup>rd</sup> 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



## 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 15<sup>th</sup> Floor, and, by our estimate, a 1,118 SF outdoor event space on the 15<sup>th</sup> 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

From: Society Hill Towers Owners Association  
To: Architects' Committee of the Philadelphia Historical Commission  
Re: 232-36 Walnut Street  
Date: July 27, 2010

TO CHAIRMAN McCoubrey AND THE COMMITTEE:

The Society Hill Towers Owners Association owns the land that directly abuts the subject address on the south side. The only thing that separates us from the property is Thomas Paine Place, a very narrow two-block street. Therefore, we believe that it is necessary for us to share our comments with you today regarding the proposed hotel construction before you. The proposed building at 184 feet in height will have an adverse effect on the historical and residential nature of the area. Our position is that the massing, height, and architecture of the proposed building all are out of keeping with both the residential dwellings of the Society Hill Historical District and the historic Independence National Historical Park. We are aware that the Society Hill Civic Association and the National Park Service have submitted their comments as well, and we are fully in agreement with them.

The Society Hill Civic Association's plan for this area on the south side of Walnut Street, including this block, is under review by the City of Philadelphia. We endorse that plan. The plan would limit any building on this site to 65' in height, effectively blocking the construction of out-of-scale buildings such as the hotel being proposed.

On behalf of the 1200 residents of Society Hill Towers, we thank you for the opportunity to register our position today. We sincerely hope that you will adopt the position taken by your staff and deny this application for the reasons they state.

Sincerely,

Bruce H. Holberg  
President SHTOA

## Opposition to 232-236 Walnut Street proposal

Dorothy S [REDACTED]

Mon 7/27/2020 12:35 PM

To: preservation <preservation@Phila.gov>

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Based on The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines, I am writing to express opposition to the proposed 15 story building at the above referenced address. Simply stated, this project does not comply with Standards 8 and 9, specifically that the proposed construction is not compatible with the massing, size, scale, and architectural features or the area and does not protect the historic integrity of the property and its environment.

Thank you for your consideration.

Dorothy Stiles

[REDACTED]  
Philadelphia, PA 19106

**Fw: ADDRESS: 232-36 WALNUT ST Proposal: Demolish non-contributing building; construct 15-story building**

preservation <preservation@Phila.gov>

Tue 7/28/2020 12:33 PM

To: [REDACTED]

FYI

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**From:** Elizabeth Walker [REDACTED]

**Sent:** Tuesday, July 28, 2020 12:30 PM

**To:** preservation <preservation@Phila.gov>

**Subject:** ADDRESS: 232-36 WALNUT ST Proposal: Demolish non-contributing building; construct 15-story building

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Dear sir/madam:

I write to express my opposition to the proposed construction of a 15 story building at the corner of 3<sup>rd</sup> and Walnut. My opposition is based upon the following:

The building does not fit in with the historic surroundings.

For those who want to provide more dense housing, a hotel is not the answer. That is for transient visitors and not intended, I am sure, to be affordable.

There is no good reason to place this imposing structure into the residential community bordering the important federal park.

Thank you for listening, Beth Walker, 210 Locust Street, Unit 9G Philadelphia, PA 19106

Sent from [Mail](#) for Windows 10