

Public comment on REVISED application for
232-36 Walnut Street

John Gibbons, Architect and Urban Planner

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Philadelphia, PA 19118
267.474.9741
Gibbons3@comcast.net

September 4, 2020

Philadelphia Historical Commission
One Parkway, 13th Floor
1515 Arch Street
Philadelphia, PA 19102

Re: 232-236 Walnut Street

As the planning consultant firm principal responsible for the 2017 Society Hill Neighborhood Plan, I have the following comments regarding the inconsistency of the proposed redevelopment at 232-236 Walnut Street (as revised and posted yesterday on the Commission's website), with the Plan recommendations.¹

The development as currently proposed conflicts with the goals and recommendations of the Society Hill Neighborhood Plan in terms of:

- *building height; and,*
- *design.*

The development as currently proposed is for a 8 story, 100-foot-high (plus mechanicals), hotel building, part of which would be on an adjacent lot. A set back from Walnut Street of 28'-10" is proposed to meet the zoning requirement that the height of a building on a parcel abutting Independence National Historical Park may not exceed 45 feet within 25 feet of an established building line. No similar required height set back is indicated for any of the other building lines.

- *Background*

The Society Hill Neighborhood Plan was completed in 2017 by a number of professional consulting firms under the direction of the Society Hill Civic Association with extensive input from community residents and participation of Planning Commission staff. The community goals as expressed in the plan centered on the preservation of the significance of the Society Hill Historic District both as the largest concentration of 18th and early 19th Century buildings in the United States and the first Urban Renewal Area based on preservation, and as a southerly extension of Independence National Historical Park. This Neighborhood Plan was accepted by the Philadelphia City Planning Commission in July 2018.

A major concern within the community was the conflict and lack of consistency between overly permissive zoning and the potential impact of excessive development on the preservation of historic resources and the character of the historic district. This problem was identified by the Mayor's Task

¹ I do not comment on whether the proposal complies with the current zoning code.

Force on Historic Preservation as a general matter in Philadelphia. For Society Hill, the community is proposing corrective zoning remapping now included in Council Bill No 200095.

On other sensitive blocks, the plan identified a lack of appropriate area specific development regulations that could assure compatibility with the historic context. The south side of the 200 block of Walnut Street, the location of the proposed development, zoned CMX-3, falls within this category, as does the 300 block of Walnut Street. Proposed zoning changes to address these issues are now included in Council Bill No 200094.

- *Building Height*

Under the original Urban Renewal Plan, several new tall buildings proposed were limited to two locations. One location was west of 5th Street on Washington Square, on the western edge of the Society Hill Area where there were already other early 20th Century high rise commercial buildings, including high rise commercial buildings fronting the 500 block of Walnut Street. This area is the site of the Urban Renewal era high rise developments of Hopkinson House and Independence Place. The other location was the site of the former Dock Street produce market, proposed as a carefully designed juxtaposition of just 3 high rise towers in a park like setting with new modern homes by Pei and Sauer at the eastern edge of Society Hill amidst restored 18th century homes that would be a centerpiece for the urban renewal area and provide an internationally acclaimed iconic image of Society Hill and Philadelphia.

The original Society Hill Urban Renewal Area Plan recognized that height limits on the south side of Walnut Street in the eastern part of the neighborhood where the subject site is located were important in protecting the character of both the Society Hill Historic District and Independence National Historical Park.

The Washington Square East Urban Renewal Area Unit 1 "Society Hill" Technical Report of June 1958 detailed the original intent of the Urban Renewal Plan. Section 4 of the technical report, "Use and Design of Specific Areas" proposed that "controls generally more restrictive than the provisions of the Philadelphia Zoning Ordinances will apply" in commercial districts including Walnut Street. The narrative stated that along the eastern section of the south side of Walnut Street "Use and height restrictions should be mandatory to protect the appearance of existing old buildings and the National Park to the north." The narrative noted that "New commercial on Walnut Street east of Third Street will approximate eighteenth century building lines and will provide a suitable façade fronting the national Park. This frontage is restricted in height to cornice line of present structure at 224 Walnut Street" (the 3 story Nelson Building).

Appendix A of the Technical Report, "Regulations and Controls to be Enforced in the Urban Renewal Area" required that "no structure in a commercial district on Walnut Street east of Third Street shall exceed 3 stories in height" It further stated that "No structure on Walnut between 3rd and 4th Streets shall exceed 45 feet in height for the first 20 feet measured from the south side of Walnut Street". No height controls were proposed for Walnut Street west of 4th Street, reflecting the existing higher buildings on these blocks (and, relatively recently, the community supported the high rise at 500 Walnut). The 3 story height limit on blocks east of Third Street under the Urban Renewal Plan protected the setting of the National Historic landmark Merchants Exchange Building, where the height of the three story building is 45 '-6" to the top of roof structure and 57 feet to the top of the pediment, as well

as the setting of the Bishop White building and other 3 story historic structures on the north side of the 300 block Walnut Street.

The height of the main volume of the proposed building at 232-236 Walnut Street at 8 stories and 100 feet significantly exceeds these standards and would have a significant adverse impact on both Independence National Historical Park and the Society Hill Historic District. The visual impact of excessive height is further exacerbated by the proposal to set back the entire building 28 feet from the building line, instead of having a maximum 45-foot high building within 25 feet of the building lines, as is allowed in the zoning overlay for buildings abutting Independence National Historical Park. The proposed set back would also continue to expose the west-facing blank party wall of the Nelson Building at 222-30 Walnut Street.

While 60 years have passed since drafting of the original plan and some modification of the controls then proposed may be appropriate, the need for area specific development controls on new development to protect the Society Hill Historic District and Independence National Historical Park has not changed. The Society Hill Neighborhood Plan recommendations included a proposed overlay that would provide for a maximum 65-foot height limit for new construction and alterations on both the north and south sides of Walnut Street between Front and 4th Streets, consistent with being able to achieve the permitted FAR of 5 under base zoning. This 65-foot height limit overlay is included for Walnut between Second and Fourth street in City Council Bill No 200094. Sixty-five feet should be the maximum height for a development at 232-36 Walnut Street.

- *Design*

The Neighborhood Plan includes specific design guidelines for new development on Walnut Street between Front and 4th Streets, identified as Zone 3 in the plan. The plan notes that “Zone 3 functions as a low/medium rise transition between Independence National Historical Park and the Society Hill residential areas”. Existing building heights do not exceed 5- 6 stories. The plan notes that “The low/medium rise character of the street is important in maintaining the visual connection between INHP and the Society Hill Historic District and reinforce the original Urban Renewal Plan concept of Society Hill as a southern extension of Independence National Historical Park” as well as “maintaining a zone of respect around the historically significant Society Hill Towers”. The plan notes that “maintaining the low/medium rise height of the properties across from the Merchants Exchange Building and flanking Dock Street is important to maintaining this connection” The design guidelines note that “new buildings shall respond to the specific development characteristics in which they are located , including building placement, building height, articulation and materials”. The design guidelines note that “buildings shall be built to the front property line for the majority of the façade up to at least the third floor. Building facades above 38 feet may be set back behind the principal faced plane.” Building height should be limited to 65 feet.

The proposed design for 232-36 Walnut Street does not conform to these guidelines.

- *Summary*

An appropriate redevelopment of this highly visible corner site could contribute positively to both the Society Hill Historic District and Independence National Historic Park. Such a development should be consistent with the original intent of the Urban Renewal Plan and the Neighborhood Plan, not exceed

the 65 foot maximum height requirement, be built to the Walnut Street and 3rd Street building lines with the INHP-related setbacks above 45 feet from both the Walnut Street and Third Street building lines, be an attached structure, have a maximum FAR of 5, consistent with the base zoning, and be in conformance with the principal design guidelines included in the Society Hill Neighborhood Plan.

From: Society Hill Towers Owners Association
To: Philadelphia Historical Commission
Re: 232-36 Walnut Street
Date: September 8, 2020

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, even at the reduced height in the most recent application, will have an adverse effect on the historical and residential nature of the area. It also will have a detrimental effect on the beautiful symmetry of Society Hill Towers, a historic site. 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.

We are going to assume that in order for the Historical Commission to grant the owner permission to originally build the house (which now would be torn down), they had to submit plans for a building that was harmonious with the surrounding historical neighborhood. They obtained permission that allowed construction of a house that was consistent with the requirements of the location in the first place, but now wish to negate that and go in a totally different direction. What becomes of the original 1999 standards to which they were held?

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 the Architects' Committee and deny this application for the reasons they state.

Sincerely,

Bruce H. Holberg
President SHTOA

KIERANTIMBERLAKE

BILLIE FAIRCLOTH AIA
STEPHEN KIERAN FAIA
MATTHEW KRISSEL AIA
RICHARD MAIMON FAIA
DAVID RIZ FAIA
JASON SMITH AIA
JAMES TIMBERLAKE FAIA

JOANNE AITKEN FAIA
RODERICK BATES
MICHAEL BIANCHI AIA
STEPHANIE CARLISLE
ANDREW CRONIN AIA
KATE CZEMBOR AIA
MARK DAVIS AIA
DAVID FEASTER AIA
LAURENT HEDQUIST AIA
RICHARD HODGE AIA
CHRISTOPHER MACNEAL AIA
JON McCANDLISH AIA
JOHANN MORDHORST AIA
TIM PETERS AIA
MARILIA RODRIGUES AIA
RYAN WELCH
CARIN WHITNEY

8 September 2020

Mr. Robert Thomas, Chair
Philadelphia Historical Commission
City of Philadelphia
1515 Arch Street
Philadelphia, PA 19102

Re: Hotel Proposal, 3rd and Walnut Streets

Dear Chairman Thomas, and Esteemed Members of the Historical Commission:

I am respectfully writing in regard to the proposed hotel at 3rd and Walnut Streets as a resident of Society Hill, and as an architect and planner within the City with a keen knowledge of its history, architecture, and urban design. As this hotel project is currently proposed, I am in opposition to this revised design on two fundamental levels.

First, while the massing has improved, down to 8 stories from 15 in the first submission, this highly opportunistic project remains out of scale to its most immediate context of Society Hill and Independence National Historic Park (INHP) across from the former Merchants Exchange, designed by William Strickland, 3 and 4-story townhouses on 3rd Street, and the former Episcopal Church now serving as Episcopal Community Services. It seems to be a project best suited to the north side of Chestnut Street rather to the Walnut Street corridor, both in terms of scale, massing, and use.

While the zoning overlay now wrongly offers greater height in this particular sector of the city, the project will immediately become an outlier relative to its immediate context. Nearby Society Hill Towers is somewhat removed and more distant from the site with much open space and lower buildings in between. Anything over 5 to 6 stories on this site threatens both the immediate scale of Society Hill, and the context and reading of INHP. Strickland's Merchant Exchange Building in the Greek Revival Style, is not only one of my favorite buildings, quite modern for its time, it is one of the great buildings of Philadelphia, and it would be severely harmed by both the scale and the design of this proposed hotel.

Which brings me to the second issue. The ersatz, faux-historicist nature of the massing and façade treatment of the hotel. It is poorly informed by history and any reasonable historical architectural sources. It is a bizarre application of architectural style within Philadelphia, and at this particular site. What informed it? What are its sources? Why this, why now, why there? It has nothing to do with former Walnut Street, 18th, 19th or 20th c fabric of the city. It seems to be a 'look at me' fantasy - which then places it awkwardly in view of some of the most important architecture of Philadelphia's history.

I urge the Commission to fully reject this proposal.

Respectfully and Sincerely,



James Timberlake, FAIA
Partner

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KIERANTIMBERLAKE.COM



United States Department of the Interior

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



IN REPLY REFER TO:

10.A (INDE-SUPT)

September 9, 2020

Philadelphia Historical Commission
One Parkway, 13th Floor 1515 Arch Street
Philadelphia, PA 19102

Via email to preservation@phila.gov

Ladies and Gentlemen:

I am writing regarding the revised new development proposed for 232-236 Walnut Street, which application will be heard before you on September 11, 2010. I am representing adjacent properties of Independence National Historical Park (INHP).

The proposal for an 8 story, 100 feet high building on the property of 232-236 Walnut Street is incompatible with the character of Independence National Historical Park, specifically the Merchants' Exchange Building, Dock Street, City Tavern, the garden at 3rd and Walnut, and the Bishop White House.

I find no better words than those written to you by John Gibbons who has also commented on the proposal. His research revealing the City's intentions in 1958 when INHP was in the process of being created, and when the City was excited that the National Park Service would bring millions of dollars in development and operations and prestige to Philadelphia, is important in making decisions today:

Under the original Urban Renewal Plan, several new tall buildings proposed were limited to two locations. One location was west of 5th Street on Washington Square, on the western edge of the Society Hill Area where there were already other early 20th Century high rise commercial buildings, including high rise commercial buildings fronting the 500 block of Walnut Street. This area is the site of the Urban Renewal era high rise developments of Hopkinson House and Independence Place. The other location was the site of the former Dock Street produce market, proposed as a carefully designed juxtaposition of just 3 high rise towers in a park like setting with new modern homes by Pei and Sauer at the eastern edge of Society Hill amidst restored 18th century homes that would be a centerpiece for the urban renewal area and provide an internationally acclaimed

iconic image of Society Hill and Philadelphia. The original Society Hill Urban Renewal Area Plan recognized that height limits on the south side of Walnut Street in the eastern part of the neighborhood where the subject site is located were important in protecting the character of both the Society Hill Historic District and Independence National Historical Park. The Washington Square East Urban Renewal Area Unit 1 "Society Hill" Technical Report of June 1958 detailed the original intent of the Urban Renewal Plan. Section 4 of the technical report, "Use and Design of Specific Areas" proposed that "controls generally more restrictive than the provisions of the Philadelphia Zoning Ordinances will apply" in commercial districts including Walnut Street. The narrative stated that along the eastern section of the south side of Walnut Street "Use and height restrictions should be mandatory to protect the appearance of existing old buildings and the National Park to the north." The narrative noted that "New commercial on Walnut Street east of Third Street will approximate eighteenth century building lines and will provide a suitable façade fronting the national Park. This frontage is restricted in height to cornice line of present structure at 224 Walnut Street" (the 3 story Nelson Building). Appendix A of the Technical Report, "Regulations and Controls to be Enforced in the Urban Renewal Area" required that "no structure in a commercial district on Walnut Street east of Third Street shall exceed 3 stories in height" It further stated that "No structure on Walnut between 3rd and 4th Streets shall exceed 45 feet in height for the first 20 feet measured from the south side of Walnut Street". No height controls were proposed for Walnut Street west of 4th Street, reflecting the existing higher buildings on these blocks (and, relatively recently, the community supported the high rise at 500 Walnut). The 3 story height limit on blocks east of Third Street under the Urban Renewal Plan protected the setting of the National Historic landmark Merchants Exchange Building, where the height of the three story building is 45 '-6" to the top of roof structure and 57 feet to the top of the pediment, as well 3 as the setting of the Bishop White building and other 3 story historic structures on the north side of the 300 block Walnut Street.

The architecture, landscape, and world-wide importance of Independence National Historical Park have not changed, and neither should the City's interest change in being any less protective of the historic character of Independence National Historical Park.

Thank you for considering our point of view and valuing our unique contribution to the City of Philadelphia.

Sincerely,



Cynthia MacLeod
Superintendent



PRESERVATION ALLIANCE

for greater philadelphia

September 9, 2020

Jonathan Farnham
Executive Director
City of Philadelphia
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Re: 232-236 Walnut Street, Philadelphia

Dear Dr. Farnham,

We recognize that the owner of the above-referenced property has reduced the height of their proposed new construction significantly, from 15 stories to seven, in their application to be considered by the Historical Commission on Friday, September 10th. We also find no compelling reason to advocate for the preservation of the existing, non-contributing structure that occupies this site.

However, the proposed height of the new building, at approximately 100 feet, is still too tall for this location. In 2018, the Preservation Alliance publicly supported the proposed height limit of 65 feet for Walnut Street east of S. 4th Street as part of the Society Hill master plan developed by the Society Hill Civic Association. We see no reason to depart from that position now.

For context, we checked with several peer East Coast cities to find out whether height limits are in place for new construction in historic neighborhoods that are comparable in age and character to Philadelphia's Society Hill. Here is what we found:

- Baltimore - Mt. Vernon historic district. 70-foot height limit, 30-foot minimum. Special height restrictions were enacted 10 years ago.
- Boston - Beacon Hill historic district. 70-foot height limit, 30-foot minimum. New buildings must match cornice line of any adjacent building.
- Washington, DC – Georgetown historic district: 50-foot height limit.

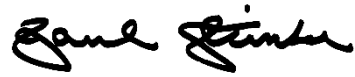
Even in our own Old City historic district, a 65-foot height limit on new construction prevails.

A decision to allow this project to proceed as proposed would open the door for more buildings of similar height to be built in the area. As I said in my testimony before the City Planning Commission in July 2018:

“Excessively tall buildings along Walnut Street that are dramatically higher than neighboring buildings could disrupt the historic scale and character of this part of the city, while undermining the primacy of Pei’s timeless Society Hill Towers development. They could also detract from the historic character of this part of our city, which is not only its oldest section but also arguably the most valuable in terms of Philadelphia’s place in history, and its appeal as a visitor destination. We should be very careful with

how we treat this area and not succumb to market pressures in developing tall buildings, simply because there may be demand for them in our present moment. Real estate valuations may boom and bust, wow and flutter, but Society Hill remains, despite unpredictable shifts of taste or opportunity. “

Sincerely,


A handwritten signature in black ink, appearing to read "Paul Steinke". The signature is written in a cursive, flowing style.

Paul Steinke
Executive Director

Fw: Public comment on 232-36 WALNUT ST

preservation <preservation@Phila.gov>

Wed 9/9/2020 12:16 PM


From: Carrie Love 
Sent: Wednesday, September 9, 2020 11:56 AM
To: preservation <preservation@Phila.gov>
Subject: Public comment on 232-36 WALNUT ST

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Hello,

I am writing in regards to the 232-36 WALNUT ST Project that will be discussed at this Friday's Historical Commission meeting.

I sincerely support the proposed construction, and disagree with the commission's conclusions that the building is not appropriate for the context and would have a negative impact on the Merchant's Exchange building. I have worked on the 400 block of Walnut Street for the last 12 years and also formerly lived on the 300 block of Walnut Street. During this time, I've researched the Society Hill Historic District, using historical resources, photographs, and records to gain a deeper understanding of the history of this area. The proposed hotel is very much in line, both in height and massing, with the Broderick building located just one block away on the corner of 4th and Walnut, which overlooks designated sites in 3 different directions (The First Bank, St. Joseph's Church, and Independence National Park).

If anything, the current structure at 232 Walnut is an offensive inclusion into the historic district: a huge mass of dead space that does not add to the historic, nor the social, character of the area. Indeed, it is the Secretary of the Interior's Guidelines that remind us that the best way to preserve history is to activate it and allow people to use it, and I believe this proposal does that respectfully and in observance of the guidelines.

Of related concern is the fact that the NPS has been, at least for several months, allowing its staff members to park their cars and SUVs on the north side (Dock Street) of the Merchant's Exchange Building. This is an egregious affront to the historic character of the building and intrudes on public enjoyment of the space. If there is truly concern for this building, this abuse of resources calls for some enforcement.

As someone who is committed to living and working in this district, I urge the commission to reconsider your position.

Thank you,
Carrie Love

Fw: the proposed hotel at 3rd and Walnut would destroy the fabric of Society Hill

preservation <preservation@Phila.gov>

Wed 9/9/2020 11:02 AM

[REDACTED]

From: Linda Witt [REDACTED]

Sent: Wednesday, September 9, 2020 11:01 AM

To: preservation <preservation@Phila.gov>

Subject: the proposed hotel at 3rd and Walnut would destroy the fabric of Society Hill

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Please make sure the thing doesn't get built. Linda Witt, [REDACTED]

Public comment on ORIGINAL application
for 232-36 Walnut Street



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



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

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 of 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

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

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Dear sir/madam:

I write to express my opposition to the proposed construction of a 15 story building at the corner of 3rd 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

Fw: 2nd & Walnut Street development proposal

preservation <preservation@Phila.gov>

Tue 7/28/2020 7:06 AM

To: Allyson Mehley [REDACTED]
[REDACTED]

From: KATHY SHELTON [REDACTED]

Sent: Tuesday, July 28, 2020 12:35 AM

To: preservation <preservation@Phila.gov>

Subject: 2nd & Walnut Street development proposal

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To Whom It May Concern:

This out-of-scale monstrosity is an offense to the architectural integrity and density of Society Hill. Going beyond the height, the generic design and the parking problems it will present, it sets a dangerous precedent in the heart of a residential neighborhood.

If your committee is truly concerned about historic preservation, you will reject this proposal right out of the box.

Thank you for your time.

Kathy Moses Shelton

(a Society Hill Towers resident and a former owner of 214 Delancey Street)

Sent from my iPhone

5th SQUARE

August 14, 2020

Statement for the Philadelphia Historical Commission
re: 232-36 Walnut Street

To Chairman Thomas and the Commission:

5th Square, an urbanist advocacy group calling for better land use and planning in Philadelphia, is strongly in support of the proposed action to demolish the non-contributing residence at 3rd and Walnut and construct a 15-story building. While it is obvious that a palatial 5,400 sq ft mansion c. 1999 is thoroughly non-contributing and has no legitimate reason to remain, we argue that in no way does the proposed massing and scale of the new building violate Standard 9 of the Sec. of the Interior's guidelines.

Chiefly, the Historical Commission staff asserts that such a tall building is "not appropriate for the context", citing its close proximity to the Merchant's Exchange building and other significant structures. However, the position of the building does not in any way affect the primary view corridor of the Merchant's Exchange looking northwest from the rear façade, and already being surrounded on all four sides with roadways, it is extremely unlikely the building would ever be lost in the idyllic fabric of Society Hill. Indeed, the Merchant's Exchange today enjoys a greater spatial isolation through building setbacks and grass lots than it ever did in the past, and bringing the 232-36 Walnut building back up to the curb line would arguably be more historically accurate and respectful to its neighbors than the current situation. Respectfully, the National Park Service should fully understand the historical context in which its properties existed, even in the Federal era, before defending an "open vista of sky" as something authentic to their mission and worth protecting.

This lends itself to the second point, where we remind the Historical Commission that the present-day so-called "historical context" that exists today in Society Hill is an artificial and ultimately unethical invention. It was created through a singular act of 20th century urban renewal that expressly *demolished "inappropriate" mid-rise buildings* in order to unnaturally showcase pre-selected Colonial-era buildings. It was an act of architectural purification that was really little more than tourism-oriented economic development. The Society Hill Towers and United

States Custom House, both far taller than the proposed 15 stories and nationally/locally designated, already disprove the assertion that another taller building cannot belong here. But going back a century, there were already historically significant midrises just a block away, such as the Irvin and Manhattan buildings, that peacefully coexisted with the Merchant's Exchange, First Bank, and other treasured Colonial sites. Yet they were demolished without objection. The creation of a neo-colonial alternate reality in the Independence National Historical Park and preserved in the SHHD is objectively less historically authentic and embodies the farthest thing from preservation. If, hypothetically speaking, those midrises were still standing today, should the Historical Commission argue for their demolition in order to bring about the "historical context" it currently defends?

The only true "context" that exists in Philadelphia, especially its oldest section, is a constantly changing and evolving one. The city should by all means identify and protect discrete buildings and sites it finds worthy of preservation. Addressing Standard 8 by calling on the developer to retain an archaeologist, for example, is a good move and one we support. But when the scope of such preservation extends to neighboring unremarkable buildings and even vacant lots for a supposed aesthetic unity, then we begin to engage in a distorted, even whitewashed version of history-making that subverts the *tradition* of how the city's urban fabric developed incrementally and heterogeneously. That is the only context upon which urban preservation can base its quest for authenticity. And eventually, a selection of buildings from this shifting context will last for generations, becoming treasured and worthy of preservation. Many people remember Society Hill Towers achieving that status in their lifetimes, when initially it was just another housing development. Nothing makes one new building more intrinsically historic than another; only the passage of time can determine that.

Today we have a city that yearns to reintegrate Society Hill with the rest of a revitalized Center City, just as it always was before urban renewal. A historic district that acknowledges this and allows change in non-contributing buildings is one that is far more honest to the spirit of the law than one that does not. The Historical Commission should not be playing gatekeeper for new buildings ready to join the fold. We urge the Commission and staff to refocus on the endangered buildings and structures that really matter to the story of the city, and approve this application.

Sincerely,
Benjamin She
5th Square