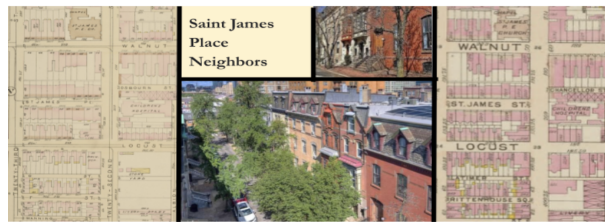


Public comment for  
2204 Walnut Street



Dr. Jon Farnham, Executive Director  
Philadelphia Historical Commission  
1515 Arch Street  
Philadelphia, PA 19103

Dear Dr. Farnham,

We are writing as your neighbors on the 2200 block of Saint James Place regarding our concerns with the ongoing developments at 2204 Walnut Street. Our concerns center around quality of life as residents, specifically with regard to the unnamed alley that borders the rear of the north side buildings on Saint James Place. This alley allows necessary access to parking places as well as rear entrances of individual houses and apartment buildings. The plans for 2204 Walnut Street propose a very large footprint that will impact both the homes and our shared alley, which currently is an easement and not a public right of way. The project, as proposed, will have a detrimental impact on our day-to-day lives. This letter will address our concerns: height of the proposed building; accessibility to and safety of the alley, especially the inability to access our own properties and damaged personal property due to construction (e.g. cars); trash storage and pickup; construction issues; and parking.

While we support development of the corridor of Walnut Street in our neighborhood, we oppose the project as proposed and request that the architect and developer make further modifications to the plans and related construction before the project should be approved.

**Height:** The proposed plans for 2204 Walnut Street include a very large footprint. We object to the height of the building because it will block the light on the northside of our three and four story townhomes. Because Philadelphia is uniquely located, slightly off the grid of true north and south, we currently get light in our northern windows. A 10 story building would block that light. At the previous Historical Commission meeting (Aug. 12, 2022), commissioners raised concerns about the appearance of the building on Walnut Street and the setbacks, however our concern lies centrally with the non-set back 10 story wall that will be on our shared 12' alley. The proposed height of the back of the building, which would directly affect us, does not seem to have been specifically considered previously. The proposed building at 2204 Walnut will block AM eastern sunlight as far as half way down Saint James. For those residents directly behind it, our north light will be completely obstructed. For this reason we strongly object to the proposed height of the overbuild, including that of the non-setback on the shared alley.

HEIGHT REQUESTS???

→ Building height restricted to no more than 7 stories

**Alley Accessibility and Safety:** We are concerned what the construction on 2204, if approved, would mean for our property access given the nightmare we have endured over the past 2-3 years. We need assurances from the architect and developer that we will not continue to endure the hardship we have faced once construction begins at 2204 Walnut Street. For over two years, alley accessibility has been consistently constrained during construction of the overbuild at 2216 Walnut Street (which has yet to be completed) as well as during daily trash pickup for the Roosevelt Apartments (2220 Walnut Street) and other businesses located on the 2200 block of Walnut Street. Construction and trash vehicles block one or both sides of the alley, limiting residents' access to the alley and entrances to our homes and/or vehicles. During the last two years, workmen park their trucks in the middle of the alley during the entire workday instead of using legal street or other

parking spaces. For weeks or months residents have not been able to get out of their parking on their property except when workmen had concluded work for the day. Resident vehicles have been damaged or dirtied by cement and other construction material. Additionally, an unlocked Port a privy has been in the alley behind the new construction. Homeless people have also formed encampments in the unfinished construction sites.

The alley asphalt paving has been severely damaged during the construction and large pot holes in the existing alley paving are a safety risk for families entering their cars, especially when ice is present.

**ALLEY REQUESTS:**

- Ensure daily accessibility to our designated parking spots and home entrances (no vehicles blocking either side of the alley).
- Repave alley upon completion of demolition to avoid safety issues as in inclement weather.
- Add sufficient lighting to the back of the building at 2204 Walnut Street to address safety.

**Trash:** Once the building is occupied, the residents of Saint James Place want clarification on the plan for trash storage and collection. Trash must be stored according to code. We do not see a place for collective trash storage in the plans that comply with the code. Further, while trash must be collected by a private service, the developer should be required to provide plans for where the trash will be emptied.

**TRASH REQUEST:**

- Provide plans for trash pickup. We request trash pickup through the front of the building (Walnut Street) instead of by way of the alley to limit the disruption caused by blocking the alley regularly during pickups, the noise of trash trucks, and mess left from emptying of dumpsters.

**Construction:** As stated above, there has been ongoing demolition and construction behind our homes for more than two years. Since development and construction began along Walnut Street, safety and accessibility have been disregarded. There have been no attempts to notify residents of construction or demolition. As residents who have endured years of construction already, we ask to be informed of a plan for how the neighborhood impact will be abated during construction. If accessibility is disregarded during construction, we will be in touch with L&I and Kenyatta Johnson's office.

**CONSTRUCTION REQUESTS:**

- Communicate with residents regarding how the neighborhood impact will be abated during construction with specific work hours to abate noise and disruption— weekdays only, 8am-4pm.
- Daily cleanup of the alley in the construction area.

**Parking:** We understand that in order to fulfill the requirement for parking spaces at the 3:10 ratio for a building of this size, the building developer may permanently rent spaces that are within 500 feet of the property and the developer must demonstrate to L&I that such spaces are continuously available. We want information on the location of those spots, especially given the planned developments along Walnut Street that may eradicate some existing parking lots. Not having designated parking spots for a building of this size would not only go against zoning requirements but also impact existing availability of street parking when future residents of 2204 Walnut turn to the street for parking.

**PARKING REQUEST:**

- Identify where parking spaces will be located and if available to rent by local residents.

Sincerely,

A concerned group of Saint James Place Residents and Neighbors

cc: Richard Gross, President, CCRA ([RGross@bwra.com](mailto:RGross@bwra.com))  
Paul Steinke, Executive Director, Preservation Alliance ([psteinke@preservationalliance.com](mailto:psteinke@preservationalliance.com))  
Sergio Coscia, Principal, CosciaMoos Architecture ([scoscia@cosciamoos.com](mailto:scoscia@cosciamoos.com))

**RE: 2204 Walnut Street**Sergio Coscia <[scoscia@cosciamooos.com](mailto:scoscia@cosciamooos.com)>

Thu 9/1/2022 11:24 AM

To: Jon Farnham <[Jon.Farnham@phila.gov](mailto:Jon.Farnham@phila.gov)>Cc: Jessica Vitali <[JVitali@cosciamooos.com](mailto:JVitali@cosciamooos.com)>; Richard Gross <[RGross@bwra.com](mailto:RGross@bwra.com)>

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John,

When you share this letter, I will note the following for the Commission:

- The rear alley referred was created as a 12 foot easement across the Walnut Street properties, not theirs, for access to rear of our properties. The Walnut Street lots are 123' 9" deep while the St. James lots are only 68'. Our building is fully within our property bounds and is set back 23'6" at grade and 18'6" starting at the second floor, from the rear of our property. The rear of one property, 2203 St. James, directly behind 2204 Walnut, is built less than 5 feet from it rear property line and is non-conforming and may be the reason they feel impinged upon. The corner property on 22<sup>nd</sup> is built with a zero rear setback as well. The remaining setbacks vary in depth, mainly to accommodate parking.
- The request for a 7-story height limit being demanded is contrary to the CCRA proposal to increase the rear height of the building to lessen the impact of on Walnut Street. Please clarify for the neighbors which approach you support.
- The remaining issues (other than construction impact) are zoning related matters and should have no bearing on the HC decision. I will answer that the trash is being handled in an enclosed trash room in the building at the bottom of a trash chute. A trash compactor will be employed. Parking is a zoning related manner and we have not even submitted a zoning application to date. From a zoning perspective, this project is as-of-right. The unlimited building height/FAR regulations were set 10 years ago when the zoning code was re-written. As far as I know, this was not disputed at the time by any neighbor.

Sergio

**CosciaMoos****Sergio C. Coscia AIA**

Principal

123 South Broad Street  
Suite 220 South Lobby  
Philadelphia, PA 19109  
Office | 267.761.9416 x 102  
Direct | 267.923.2356  
Mobile | 215.356.3042  
[scoscia@cosciamooos.com](mailto:scoscia@cosciamooos.com)  
[cosciamooos.com](http://cosciamooos.com)



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**From:** Jon Farnham <[Jon.Farnham@phila.gov](mailto:Jon.Farnham@phila.gov)>**Sent:** Thursday, September 1, 2022 10:20 AM**To:** Alexis Rossman Madden <[alexisrossman@gmail.com](mailto:alexisrossman@gmail.com)>