

**PUBLIC COMMENT FOR
4045-61 MAIN STREET**



PRESERVATION ALLIANCE

for greater philadelphia

April 1, 2024

Philadelphia Historical Commission
1515 Arch Street
Philadelphia, PA 19102

Re: 4045-61 Main Street

Dear Members of the Historical Commission,

I am writing to urge careful consideration of the 4045-61 Main Street demolition application and proposed new construction. Our comments will primarily focus on the demolition under the financial hardship provision, with additional feedback on the development proposal to come.

The property sits squarely in the center of Manayunk's industrial history. G.J. Littlewoods and Son was the oldest and, until recently, the only remaining textile-related operation in Manayunk. The future of this prominent property is critical to maintaining the character of the Manayunk Main Street Historic District.

We acknowledge the challenges that may impede the rehabilitation of the entire mill complex but do not believe that the majority of the ten structures should be lost. Moreover, we understand the overarching issue of repeated flooding along lower Main Street and the constraints it poses in redeveloping the property. However, in 2020, the PA State Historic Preservation Office released the "Manayunk Main Street Historic District Flood Guide," which details specific mitigation options appropriate for rehabilitated historic structures. We believe the development team should review this report and consider its suggestions before any permits are issued for the site. In addition, "Guidelines on Flood Adaptation for Rehabilitating Historic Buildings," released by the National Park Service in 2019, could also be a resource. We also question whether the possibility of seeking a variance for flood regulation exemption, which is available for historic properties, has been explored thoroughly enough.

In addition, we recognize that the site's incremental expansion, industrially designed and interconnected spaces are challenging to reuse in their current form. That being said, we are dismayed at the scope of the demolition and the scale of the new proposal. It is alarming that most of the historic fabric, including the former Fountain Hotel (offices since the late 1880s), is slated to be demolished. While a portion of the facades along Main Street are proposed for incorporation into the new scheme, we believe that rehabilitating more of the existing structures would result in a design that is more sympathetic and appropriate to the historic district.

We urge the Commission to encourage greater retention of historic fabric in the new development, upholding the integrity of the Main Street Manayunk Historic District paying homage to Manayunk's industrial past.

Sincerely,

Paul Steinke, Executive Director

Manayunk Neighborhood Comments to the Committee on Financial Hardship for 4045-61 Main Street

Kevin Smith <kevin.smith@manayunkcouncil.org>

Wed 4/3/2024 8:25 AM

To: preservation <preservation@Phila.gov>

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Manayunk Neighborhood comments to the Committee on Financial Hardship for 4045-61 Main Street

I acknowledge this is after the submission deadline and I plan to present this testimony in person at the hearing.

Testimony to the Historical Commission Hardship Committee

April 3, 2024 9am

I've only had a few days to review the 131 page application. I could probably write a 131 page rebuttal but a few things jumped out.

In broad strokes the document does several things.

It makes several major straw man arguments

- If re-used it must be re-used as I2 medium industrial
- If re-used all existing structures must be kept.
- The buildings are so interconnected it is all or nothing.

It tries to establish the false dichotomy that the property must be re-used in it's current form or completely demolished and rebuilt as pure residential.

Regarding if re-used it must be re-used as I2 medium industrial. The entire stretch of Main Street from Shurs lane to Wissahickon Creek is ICMX with a sprinkling of I1. Allowing uses from office space and motorcycle sales to movie theaters and strip malls.

The letter from AKRF (p26) hits several of the straw man arguments and adds one of it's own. They focus on truck traffic, chemical storage and "heavy industrial equipment" and throw in their own straw man argument about dry waterproofing which is in this context is impossible. Whatever use is proposed, the ground level will flood to some degree with some frequency and once in a while to a high degree. Whether you are storing boxes, bales, barrels or \$6m worth of cars with 2000 gallons of gas.

They argue temporary lodging would require a variance while also proposing a

seven story apartment block. They argue ADA compliance would be a hardship while proposing a seven story apartment block.

They also simply assert, without documentation, that emergency egress would require an "annex" and such an annex would compromise the redevelopment potential for the adjacent lot. This "annex" is also where the proposed development will have it's emergency egress which won't, of course, impact the adjacent property nor will being sandwiched between the railroad tracks and a seven story building affect it's redevelopment potential.

They also assert, without evidence that "The use of the building as a temporary lodging facility, particularly with the issue of emergency access to an elevation at or above the DFE, is challenging for flood response. Transient residents and visitors to this area may not be familiar with flood response procedures and evacuation routes." I hope there isn't a fire. As fast as the water rose during tropical storm Ida time to react was measured in hours, not minutes.

cbp Architects on page 23 points out the insurmountable problems of re-use.

Lack of sufficient egress. The possibility for viable egress to the public right-of-way in the event of an emergency is limited to the Main Street edge of the existing buildings. The east, west and rear sides of the property provide no access to a public right-of-way as they are against the adjacent building, the grade of Shurs La., the retaining wall at the 11 Shurs La. property line and the railroad viaduct. Egress paths in any direction other than towards Main Street would be dead ends. The Main Street edge, being in the flood plain is also not viable

The site has easy access to Shurs Lane above the 100 year flood level. An egress to Shurs lane, and pathways to it, will have to be created. That is what the proposed development will do and what any re-use of the site would also do. Straw man argument.

Given the ages of the various portions of the facility, environmental hazards, such as lead paint, and asbestos may be present and would need to be abated. Mold, resulting from the aforementioned moisture, may be an ongoing concern. Radon may be present due to the existing rock outcroppings, which are exposed in the facility and may require mitigation.

These are common conditions not insurmountable problems. Any sort of re-use would have to deal with these issues just like I do in my basement. Straw man argument.

And the nail in the coffin. There are no toilet rooms.

A letter from Nancy L Templeton, p52 offers several, as per their description,

opinions about the project. The opinions are offered without evidence or argumentation. All can be rebutted but two stand out.

"The new development will bring in residents who can frequent local businesses providing and economic boost for the neighborhood."

Every residential project in Manayunk proposed in the last 25 years has made this claim. Every one has promised to revive and bring prosperity to Main Street. Yet Main Street struggles with dead afternoons and hard to fill shops. Building a commercial presence will help fill those gaps. Not a few more people amongst the 15000 already withing walking distance and 30-50 thousand a short drive or bike ride away.

"This development will provide sustainable growth through its adaptive use of an existing vacant structure, infill and redevelopment of vacant property, and transit oriented development."

The development is not proposing any sort of adaptive re-use but complete demolition and a seven story apartment block with a little Wissahickon lipstick.

Econsult Solutions (p57) argues in their summary and conclusions that the buildings are poorly suited to any use. They analysed using the existing buildings as Industrial (must be I2 straw man), Retail/Restaurant (another straw man), Office space (complete re-use straw man) and multi-family residential in existing buildings (only alternative straw man, complete re-use straw man). Their conclusion is there is no re-use for the existing buildings.

Nowhere in the document is there a discussion of the available parking across the street and the possibility of mixed re-use with the preservation of the significant buildings at the south-east end. Coupled with redevelopment of the Shurs and Main corner as an amenity for Main Street and development of a three-four story commercial or mixed use in between, conforming to the existing scale and context of Main Street Manayunk.

In the end we are expected to conclude that the only feasible project is a seven-story apartment block.

What is profitable is, of course, continent on what was the property costs and perhaps the hardship committee has access to that information. We don't know if they can assess the cost of less less ambitious project based on a realistic property value would be. Hopefully we aren't relying exclusively on the reports of people who were "asked to provide professional planning services to support Urban Conversions' (Owner) Financial Hardship Application to the City of Philadelphia Historical Commission."

We are also left wondering if it's so impossible and impractical to put any sort of commercial use on the site because of frequent flooding, why is the best solution to pack it full of people and cars.

The fact is the building complex is not a house of cards as is evident when you walk through it. It is the old hotel building at the north-west (Shurs and Main) corner and three substantially intact historically relevant buildings at the south-east end (by Starfinder). There doesn't appear to be any engineering evidence presented that these buildings are unstable.

Around and between these has grown an assortment of buildings that would be challenging to re-use and should be open for discussion.

There are many solutions besides wiping the slate clean and building a seven-story apartment block and we hope the committee will give the developer an opportunity to consider them.

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Kevin Smith, President, Manayunk Neighborhood Council.

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