

ADDRESS: 708 SANSOM ST

Proposal: Construct 35-story mixed-use tower

Review Requested: Review and Comment

Owner: JR Sansom Partners LLC

Applicant: Meredith Ferleger, Dilworth Paxson LLP

History: vacant lot

Individual Designation: None

District Designation: Jewelers' Row Historic District, Non-contributing, pending

Staff Contact: Jon Farnham, jon.farnham@phila.gov

OVERVIEW: This application proposes constructing a 35-story mixed-use retail and residential tower at 708 Sansom Street. The property known as 708 Sansom Street is an assemblage of vacant lots formerly known as 702, 704, 706, and 710 Sansom Street and 128 S. 7th Street. The property is in the proposed Jewelers' Row Historic District. The district nomination is pending before the Historical Commission, which continued the review of the nomination in May 2020 until the Historical Commission resumes in-person meetings.

The proposed building would be 35 stories in height, with a 31-story tower on a four-story podium. The building would have frontages on Sansom Street and S. 7th Street. The entrance to the retail space would be located on Sansom Street. The entrance to the residential lobby, parking, and loading dock would be located on 7th Street. The building would be clad in aluminum and glass. The top of the podium would align with the cornice height of the building to the west. Floors 5 to 20 would cantilever 7'-6" to the west, out over the building at 712-14 Sansom Street. Floors 21 to 35 would cantilever 4'-6" to the west.

The Historical Commission must determine the scope of its jurisdiction over this application, full jurisdiction or review-and-comment jurisdiction. Section 14-1005(4) of the preservation ordinance states that "the Historical Commission's scope of review of applications for building permits for construction, as defined herein, shall be limited to a 45-day period of comment." Section 14-203(76) of the ordinance defines "construction" as "the erection of a new building, structure, or object upon an undeveloped site." Section 2.23 of the Historical Commission's Rules & Regulations defines an "undeveloped site" as:

a property within an historic district which is not individually designated, to which the inventory in the historic district nomination attributes no historical, cultural, or archaeological value, and upon which no building or structure stood at the time of the designation of the historic district.

The site at 708 Sansom Street is not individually designated; the inventory for the proposed Jewelers' Row Historic District does not attribute any value to the vacant lot; and no structure stands on the site currently. The site at 708 Sansom Street is an "undeveloped site." However, some floors of the proposed building would cantilever 7'-6" over the property to the west, perhaps changing that determination. While the Historical Commission has reviewed and approved at least two applications involving towers with cantilevers over adjacent properties, neither involved an "undeveloped site." Therefore, those cases do not shed any light on this question.

In February 2020, the Historical Commission reviewed and commented on an application proposing to construct a 24-story mixed-use retail and residential tower at this site at 708 Sansom Street. At that time, the Historical Commission concluded that its jurisdiction was

limited to review-and-comment because the site was “undeveloped.” The 24-story tower project was eventually abandoned.

If the Historical Commission determines that it enjoys full, not review-and-comment, jurisdiction over this site because it is not “undeveloped,” owing to the cantilever, then the application is subject to the 90-day clock in Section 14-1005(6)(f) of the preservation ordinance. For properties under consideration for designation like this one, the Department of Licenses & Inspections is prohibited from issuing a building permit unless the Historical Commission approves the application, or the Historical Commission does not take a final action on the nomination within 90 days of the submission of the application. In other words, if the Historical Commission does not designate the district within 90 days of the submission of the application, the Department of Licenses & Inspections may issue the permit regardless of the Commission’s opinion of the proposal. The application was submitted on 12 March 2024. The 90-day review period will end on 10 June 2024, prior to the Historical Commission’s meeting on 14 June 2024. Given that the Historical Commission has no plans to resume in-person meetings in the next few months and has committed to providing new 60-day notice to property owners in the proposed district before resuming the review of the nomination for the Jewelers’ Row Historic District, it appears unlikely that the Historical Commission will complete the designation of the historic district within the allotted 90 days and the Department may issue the permit without the Commission’s approval.

Following the Architectural Committee’s review of the application on 26 March 2024, the applicant’s architect revised the design of the façade of the base or podium facing Sansom Street. The architect described the changes as follows:

We lowered the horizontal trim line on the retail glass panels and aligned it with the building fascia to the west. We also aligned the horizontal trim band at the eastern entry bay with the fascia line on the building to the east. We feel this move would blend the façade lines while maintaining a distinction between the new and old buildings. We also want to carry the tower façade down across the parking garage so the overall façade is seamless.

SCOPE OF WORK:

- Construct 35-story tower.

STANDARDS FOR REVIEW:

The Secretary of the Interior’s Standards for the Treatment of Historic Properties and Guidelines include:

- *Standard 9: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*
 - o Given that the property where the tower will be constructed is a vacant lot, the new construction will not destroy historic materials that characterize the property, satisfying Standard 9. The four-story base or podium of the proposed building is not compatible with its environment in scale or architectural features, and therefore does not satisfy Standard 9. It should be redesigned to be more compatible with the proposed historic district.

STAFF COMMENT: The staff comments that, to satisfy Standard 9, the base of the proposed tower should continue to be refined to be more compatible with the proposed historic district.



Figure 1. A rendering of the proposed tower for 708 Sansom Street reviewed by the Architectural Committee and Historical Commission in January and February 2020.

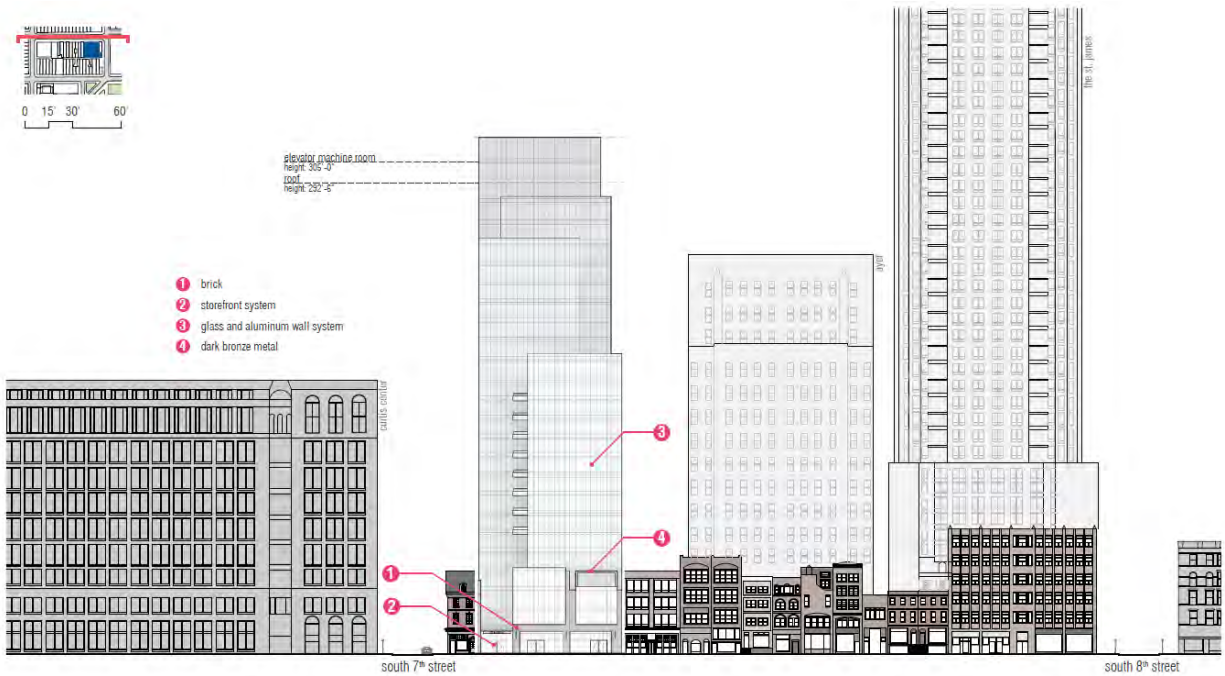


Figure 2. The north or Sansom Street elevation of the proposed tower for 708 Sansom Street with context reviewed by the Architectural Committee and Historical Commission in January and February 2020.



DIRECT DIAL NUMBER:
(215) 575-7052

Meredith Ferleger
mferleger@dilworthlaw.com

March 12, 2024

Via E-mail (preservation@phila.gov)
Architectural Committee of the
Philadelphia Historical Commission
c/o Dr. John Farnham, Executive Director (jon.farnham@phila.gov)
1515 Arch Street – 13th Floor
Philadelphia, Pennsylvania

Dear Committee Members:

On behalf of Pearl Properties (“Pearl”), we enclose herein a presentation requesting final approval for Pearl’s proposed multi-story residential tower (the “Project”) for the property known as 708 Sansom Street (the “Property”). Committee members may recall the Property was previously the subject of a prior high rise apartment building development proposal (presented to and reviewed by the Committee in early 2020), that was eventually tabled by Toll Brothers as the property owner at that time. The Property was at that time, and remains today, an undeveloped vacant lot which was subsequently sold to Pearl. The newly envisioned Project follows extensive discussions and public meetings with neighborhood stakeholders and reflects Pearl’s commitment to respect and enliven the Jewelers’ Row corridor while blending with the surrounding neighborhood comprised of buildings of mixed character and mass in and around Washington Square.

The Property sits just off the corner of Sansom Street and S. 7th Street with 90.3’ of frontage on Sansom Street and 29.7’ of frontage on S. 7th Street. The Project rises thirty-four (34) stories and stands 403’-06” feet in height. Within the building, the Project includes ninety-nine (99) residential dwelling units, fifty (50) vehicular parking spaces, one (1) loading space, and 1,495sf of retail space fronting Sansom Street. To preserve the crucial retail character of the Sansom Street frontage, all vehicular access enters the site off of S. 7th Street through a valet-managed interior motor court.

Pearl’s Project design seeks to differentiate from the modern glass towers formerly presented to the Committee and instead, more carefully align with the unique design components found along Jewelers’ Row. The Project massing is articulated into several vertical segments. The first segment rises from the base to the 5th floor and is compatible with both the neighboring residential

708 Sansom Street

March 12, 2024

Page 2

towers and street-level commercial properties. The vertical segments continue to change at increasing floor levels to form roof terraces. As a result of this design, the segments create varying silhouettes from different points of view.

Pearl's architect, DAS Architects + Interiors, has designed the building façade in vertical sections of terracotta colored metal panels that complement the traditional beige and red brick buildings in the area. Dark brown horizontal trim divides the terracotta panels adding a distinctive rhythm to the building. The 7th Street vehicle entrance is bright and open above to encourage cascading natural light. Most importantly, the Sansom Street entrance fills a missing void in the Jewelers' Row commercial corridor by encouraging pedestrian activation along Jewelers Row.

We look forward to presenting the Project at your next Committee meeting on March 26, 2024.

Best Regards,

/s/ Meredith L. Ferleger

Meredith L. Ferleger, Esq.

cc: DAS Architects + Interiors
Reed J. Slogoff
James Pearlstein



MEMORANDUM

TO: Philadelphia Historical Commission

FROM: Meredith Ferleger, Esquire

SUBJECT: 708 Sansom Street (OPA # 881000260)
Owner: JR Sansom Partners LLC
(Pearl Properties affiliate)

DATE: April 12, 2024 Meeting

INTRODUCTION

Applicant, JR Sansom Partners, LLC (“JR Sansom”) initiated an application to the Philadelphia Historical Commission (the “Commission”) on March 12, 2024, seeking approval for the development of a multi-story residential tower at 708 Sansom Street, Philadelphia, PA 19106 (the “708 Property”) on an existing vacant lot. As more fully explained below, the Applicant asserts the Commission’s review should be exercised pursuant to a “review-and-comment” standard. Solely because the residential tower proposes a modest cantilever that, while setback from the frontage, extends over a narrow portion of the adjacent property located at 712-14 Sansom Street, Philadelphia, PA 19106 (the “714 Property”), a question has been raised as to the Commission’s appropriate scope of review for the proposal. Even if the Commission should determine its jurisdiction is plenary, the proposal should be approved based on the design, as well as past precedent before the Commission described below.

BACKGROUND/PROJECT DESCRIPTION

In 2023, JR Sansom acquired the 708 Property, which is known as Unit 1 in a two (2) Unit Master Condominium, recorded with the Department of Records on August 8, 2019 at Document I.D. No. 53548344. The Master Condominium was declared by the prior owner of the 708 Property and created a Master Condominium between the 708 Sansom Property and the 714 Property. In conjunction with the Master Condominium, the 708 Property and the 714 Property comprise two (2) distinct ownerships with separate tax parcel identifiers and legal owners.

The Master Condominium includes an **express easement** granted by the 714 Property to the 708 Property (the “Easement”). Article 8 of the Master Condominium states “[t]he roof of the [714 Property] building is subject to an easement in favor of the [708 Property] Owner for access for construction and installation of any improvements, equipment or facilities to be constructed or installed on the roof in and the air rights above the roof, and for their maintenance, repair and

replacement and for access through [the 714 Property] to access such improvements, facilities or equipment.” No separate condominium or legal ownership in the air space above the 714 Property was created.

Currently, 708 Sansom Street is a vacant parcel, with the prior structures having been demolished in 2019, by Toll Brothers.¹ The 714 Property contains a four (4) story existing building. As noted below, the Commission is currently considering the potential nomination of the Jewelers’ Row Historic District (the “District”). If designated, the District would cover a geographic area that includes the 708 Property and the 714 Property.

The 708 Property sits just off the corner of Sansom Street and S. 7th Street with 90.3’ of frontage on Sansom Street and 29.7’ of frontage on S. 7th Street. The Project rises thirty-four (34) stories and stands 403’-06” feet in height. Within the building, the Project includes ninety-nine (99) residential dwelling units, fifty (50) vehicular parking spaces, one (1) loading space, and 1,495 sf of retail space fronting Sansom Street. To preserve the crucial retail character of the Sansom Street frontage, all vehicular access enters the site off of S. 7th Street through a valet-managed interior motor court. The Project massing is articulated into several vertical segments. The first segment rises from the base to the 5th floor and is compatible with both the neighboring residential towers and street-level commercial properties. The vertical segments continue to change at increasing floor levels to form roof terraces. As a result of this design, the segments create varying silhouettes from different points of view. The building façade has vertical sections of terracotta colored metal panels that complement the traditional beige and red brick buildings in the area. Dark brown horizontal trim divides the terracotta panels adding a distinctive rhythm to the building. The 7th Street vehicle entrance is bright and open above to encourage cascading natural light. The proposal described herein will be referred to herein as the “Project”.

Importantly and most relevant to the analysis herein, pursuant to rights granted to the 708 Property via the Easement, the Project includes a slight cantilever over the 714 Property. Starting at the fifth floor of the building, the cantilever varies from 4’-6” to 7’-6”. Additionally, the cantilever is setback from the Sansom Street frontage by 12’-6”.

OVERVIEW OF RELEVANT CODES & REGULATIONS

Guidance to assess the Commission’s jurisdiction is set forth in two (2) main places: the Philadelphia Zoning Code (“Zoning Code”) Section 14-1000 “Historic Preservation” (the “Preservation Ordinance”) and the Philadelphia Historical Commission Rules & Regulations (the “PHC Regs”). The Preservation Ordinance tasks the Commission with reviewing and acting upon “all applications for building permits to *alter* or demolish historic buildings, structures, sites, or objects, or to *alter* or demolish buildings, structures, sites, or objects located within historic

¹ The Building was demolished pursuant to Demolition Permits issued as follows:

702, 706 Sansom Street – Demo Permit # 734604 issued November 9, 2016
710 Sansom Street – Demo Permit #734605 issued November 9, 2016

districts, pursuant to § 14-1005.” See *Preservation Ordinance Sec. 14-1003(2)(e)* (emphasis added). The Commission further has authority to “[r]eview and comment upon all applications for building permits to construct buildings, structures, or objects within historic districts, pursuant to § 14-1005.” See *Preservation Ordinance Sec. 14-1003(2)(f)*. The PHC Regs define “alter” or “alteration” as “[a] *change in the appearance* of a building, structure, site or object which is not otherwise covered by the definition of demolition, or any other change *for which a permit is required* under the Philadelphia Code of General Ordinances” (emphasis added). See *PHC Regs 2.1, 6.2*. Similarly, PHC Regs 6.1 requires a property owner to obtain a permit from L&I before altering a “historically designated building, structure, site, object, or public interior portion of a building or structure; constructing a building, structure, or object within a historic district.”

Although the Commission asserts plenary jurisdiction over most new construction, it exerts “review-and-comment” jurisdiction over a new construction proposal on an undeveloped site within a historic district. See *PHC Regs. 8.1*. Because the prior structure that sat on the 708 Property was authorized for demolition *prior to* the inception of the nomination for the District, the 708 Property is considered an undeveloped site under PHC Regs. 8.1.

ANALYSIS

As referenced, on March 17, 2017, the Preservation Alliance for Greater Philadelphia (the “Alliance”) submitted a nomination for the “Jewelers’ Row Historic District” (the “Nomination”). The geographic boundary for the District includes both the 708 Property and the 714 Property, which are both specifically identified in the Nomination’s inventory. Since the Nomination was first made in 2017 and a subsequent continuance request was made following 2020 proceedings, the Nomination has been continued indefinitely pending the City’s return to in-person meetings, which is not, to the Applicant’s knowledge, slated to occur anytime soon. Accordingly, this analysis assumes that the Commission will *not* act on the Nomination in any time period that would otherwise alter this analysis.

Pursuant to the Preservation Ordinance, Section 14-1005(4), during the pendency of a district nomination, the Commission must consider any development on a vacant lot on a review-and-comment basis. Conversely, the Commission would exercise full review jurisdiction for an application concerning alterations to a contributing structure. Here, it is unambiguous that the development of the 708 Property would be subject to review-and-comment jurisdiction (which is precisely the same level of review the Commission previously exercised for the prior high rise building proposed by Toll Brothers’ on the same site). Conversely, if the owner of the 714 Property sought modifications to its existing structure, the Commission would have plenary jurisdiction over such alteration requests.

In this case, one can only argue the breadth of the Commission’s review might be other than “review-and-comment” because the Project includes a modest cantilever over the 714 Property building. The building cantilever, however, which includes setbacks from both Sansom Street and a rear alley, will not touch, connect to or otherwise impact the 714 Property structure in any way. Moreover, the 708 Property has a documented legal right to cantilever over the 714 Property because of the Easement. As described, the cantilevered portion of the Project does not touch the roof of the 714 Property, extends no more than 7’-6” over the 714 Property, and is setback more

than twelve feet (12') from the building front and more than fifteen feet (15') from the rear alley. Further, there is no existing or proposed access between the Project and the 714 Property. Simply stated and jurisdiction aside, this application does not propose to "alter" the 714 Property in that it does not change the appearance of the building or structure. Crucially, the Applicant asserts **no Building Permit will be required for the 714 Property as a result of the proposed cantilever, which will be encompassed entirely within the Building Permit eventually granted to the 708 Property.**

Notwithstanding the arguments noted above, even applying a plenary scope of review over the Project, the Commission must approve the subject application based upon the Commission's Architectural Committee ("ARC") and the Commission review in comparable applications.²

The Commission's prior manner of cantilever review.

In 2015, the Commission considered an application by Parkway Corporation ("Parkway") to develop the properties at 709-13 and 715-17 Chestnut Street (the "Parkway Application"). In the Parkway Application, the developer presented two (2) applications to the Commission. Just as is the case here, 709-13 Chestnut Street (the "709C Property") was a vacant lot on which Parkway proposed to build a new 32-story residential tower. The adjacent property at 713-15 Chestnut Street (the "713C Property") is the site of the Union Trust Building, which is individually listed on the Philadelphia Register of Historic Places (the "Register"). The residential tower to be built on the 709C Property included a building cantilever over the Union Trust Building beginning at the front of the two (2) buildings, rendering the overhang visible from the public way. The plans did not illustrate any change to the exterior historic fabric of the Union Trust Building.

At the ARC meeting, the Commission's staff questioned the Commission's scope of jurisdiction given the unusual property configuration. Staff recommended that the Commission's jurisdiction should be limited to the effect of the new building's cantilever over the Union Trust Building. ARC members further discussed the effect of the overhang and ultimately recommended approval to the Commission.

Following the ARC, the Commissioners confined their discussion to the overhang. Notably, the Commissioners urged Parkway to revise the overhang design to setback from the Union Trust Building frontage. Although Parkway declined to revise the overhang design, the Commission overwhelmingly voted to approve the project.

² Should the Commission elect to exert plenary jurisdiction, the Applicant submits that L&I will be *required* to issue a Building Permit for the Project notwithstanding the Commission's jurisdiction or ultimate decision, in the event that the Commission does not act on the District Nomination *and* ninety (90) days elapse after JR Sansom's application to the Commission. JR Sansom's application was made to the Commission on March 12, 2024. Ninety (90) days following the application is June 14, 2024. It is not likely the Nomination will be finalized on or before June 14, 2024, and therefore, L&I must issue a permit without regard to the pendency of the Application before the Commission. See *Preservation Ordinance § 14-1005(6)(f)*.

Here, the Commission can draw guidance from the staff's recommendation in the Parkway application as accompanied by the comments and actions of the members of the ARC and the Commission. In addition to a strict interpretation of relevant terms of the Preservation Ordinance, as described above, the Applicant suggests the evidence establishes a clear jurisdictional limit when considering the effect of a cantilever on a historic resource. This is especially true in this case where the cantilever is granted via the Easement and does not constitute the creation of a separate legal parcel whereby the Commission might have jurisdiction under its subdivision/consolidation rules. In the event that the Commission holds otherwise, the Parkway case instructs that the Commission should weigh only the effect of the new construction cantilever on the historic resource. In so doing, the Commission has the authority to, and should approve, the Project as designed, considering the cantilever *does* setback from the 714 Property frontage and the Commission approved a larger cantilever with no setback in the Parkway Application.

CONCLUSION

The Zoning Code, in which the Preservation Ordinance sits, mandates that “[w]here the meaning of a restriction in this Zoning Code is ambiguous and the intent cannot be discerned through the usual rules of statutory construction, the restriction shall be construed in favor of the landowner, provided that the resulting construction does not lead to irrationality in the Zoning Code.” *See Zoning Code Sec. 14-201(14)*. Absent a definitive basis in statute, or a specific reference in the District Nomination containing the 714 Property that references the significance of the air above the 714 Property building, the ordinance must be construed in favor of the 708 Property owner which mandates that the Commission exercise only “review-and-comment” jurisdiction over Project. The conscientiously designed building on the 708 Property carefully utilizes the Easement in a fashion that, coincidentally, respects the Commission’s preferences espoused during the Parkway project review. Finally, since the Commission has yet to render a final decision on the Nomination of the District, the historic contribution of the 714 Property remains “pending” and therefore, the Commission’s review of the Project should be limited to “review-and-comment.”

cc: Jonathan Farnham, PhD, Executive Director

708 SANSOM STREET PHILADELPHIA, PA 19106

PHILADELPHIA HISTORICAL COMMISSION
April 03, 2024 (Revised)



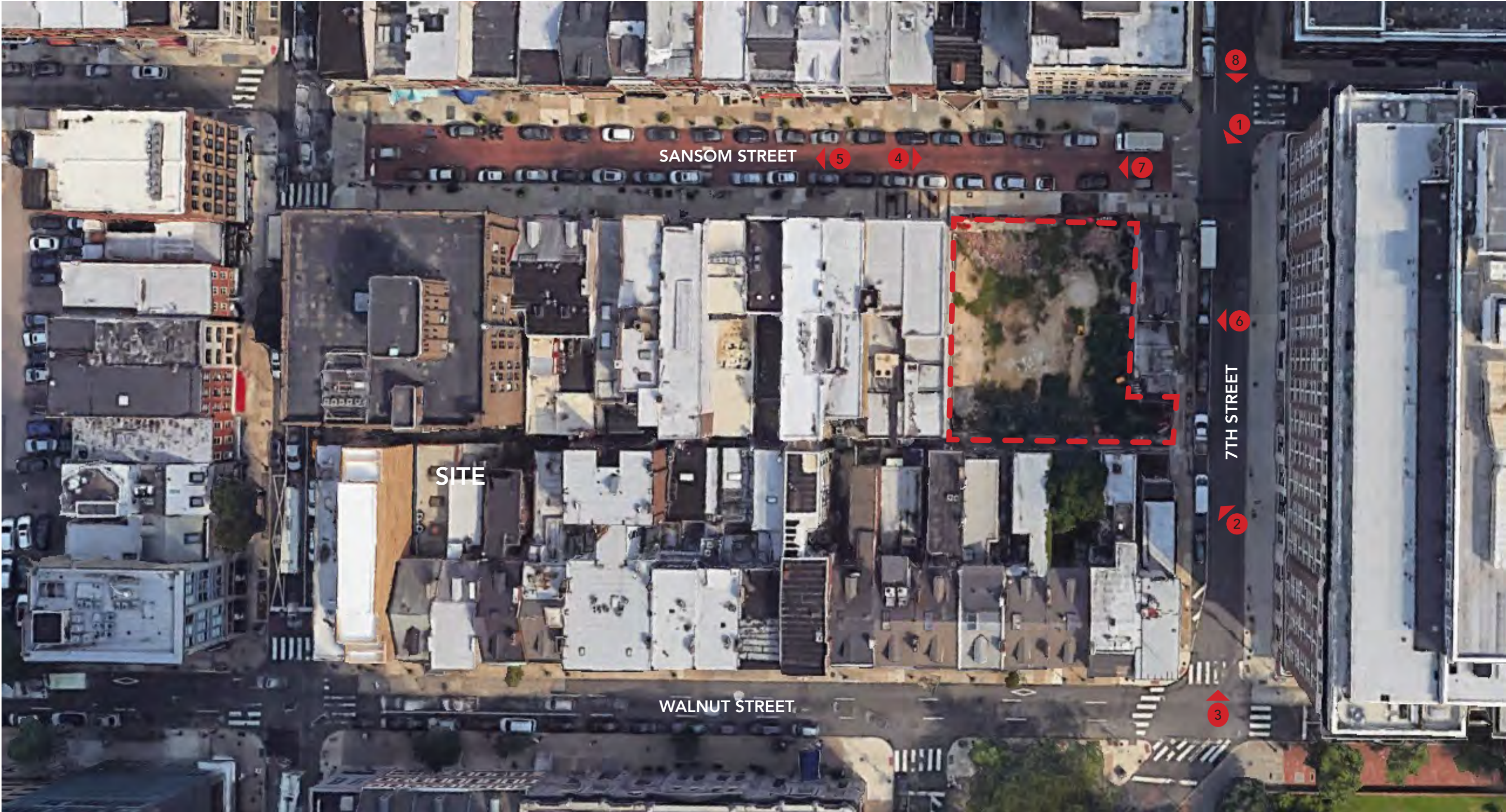




View looking North



View looking Southeast





1 Looking Southwest on Sansom St.



3 Looking North on 7th Street



2 Looking Northwest on S7th Street



4 Looking East on Sansom St.



5 Looking West on Sansom St.



7 Looking West on Sansom St.



6 Looking West on S7th St.



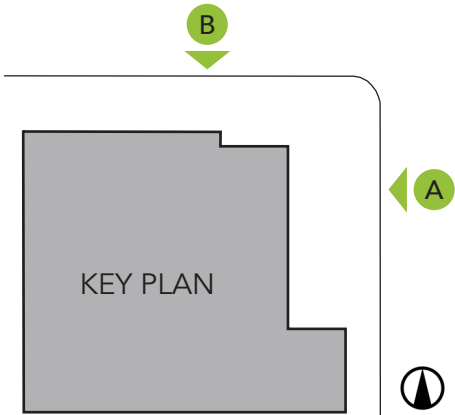
8 Looking South on S7th St.







- 1 Vertical Aluminum Clad Piers
- 2 Horizontal Aluminum Clad Slab Covers - Dark
- 3 Horizontal Aluminum Clad Slab Covers - Light
- 4 Aluminum And Clear Glass Windows
- 5 Aluminum And Spandrel Glass At Parking
- 6 Tile Finish
- 7 Sculptural Metal Tree
- 8 Metal Canopy With Planters
- 9 Planters At Roof Edge



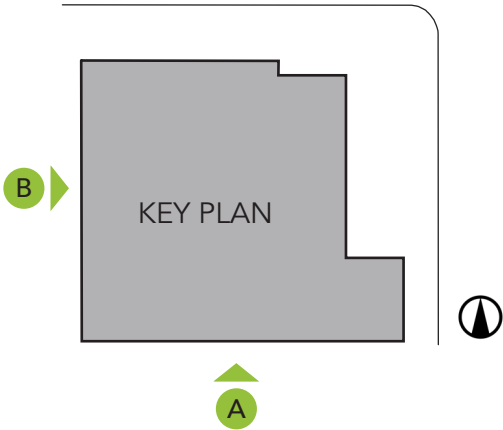
A- EAST BUILDING ELEVATION



B- NORTH BUILDING ELEVATION

11 | EXTERIOR | SOUTH & WEST BUILDING ELEVATIONS

- 1 Vertical Aluminum Clad Piers
- 2 Horizontal Aluminum Clad Slab Covers - Dark
- 3 Horizontal Aluminum Clad Slab Covers - Light
- 4 Aluminum And Clear Glass Windows
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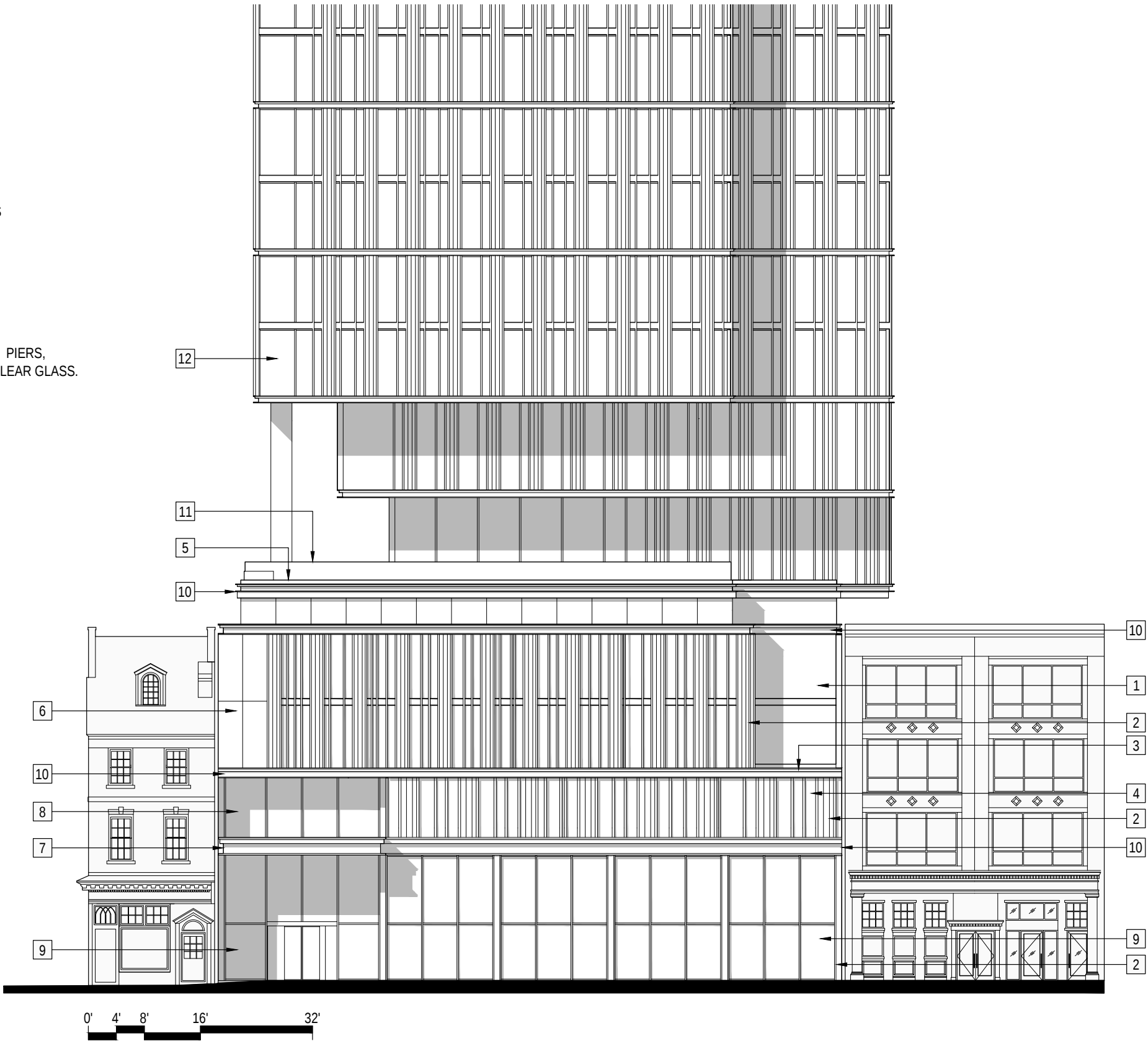
A- SOUTH BUILDING ELEVATION



B- WEST BUILDING ELEVATION

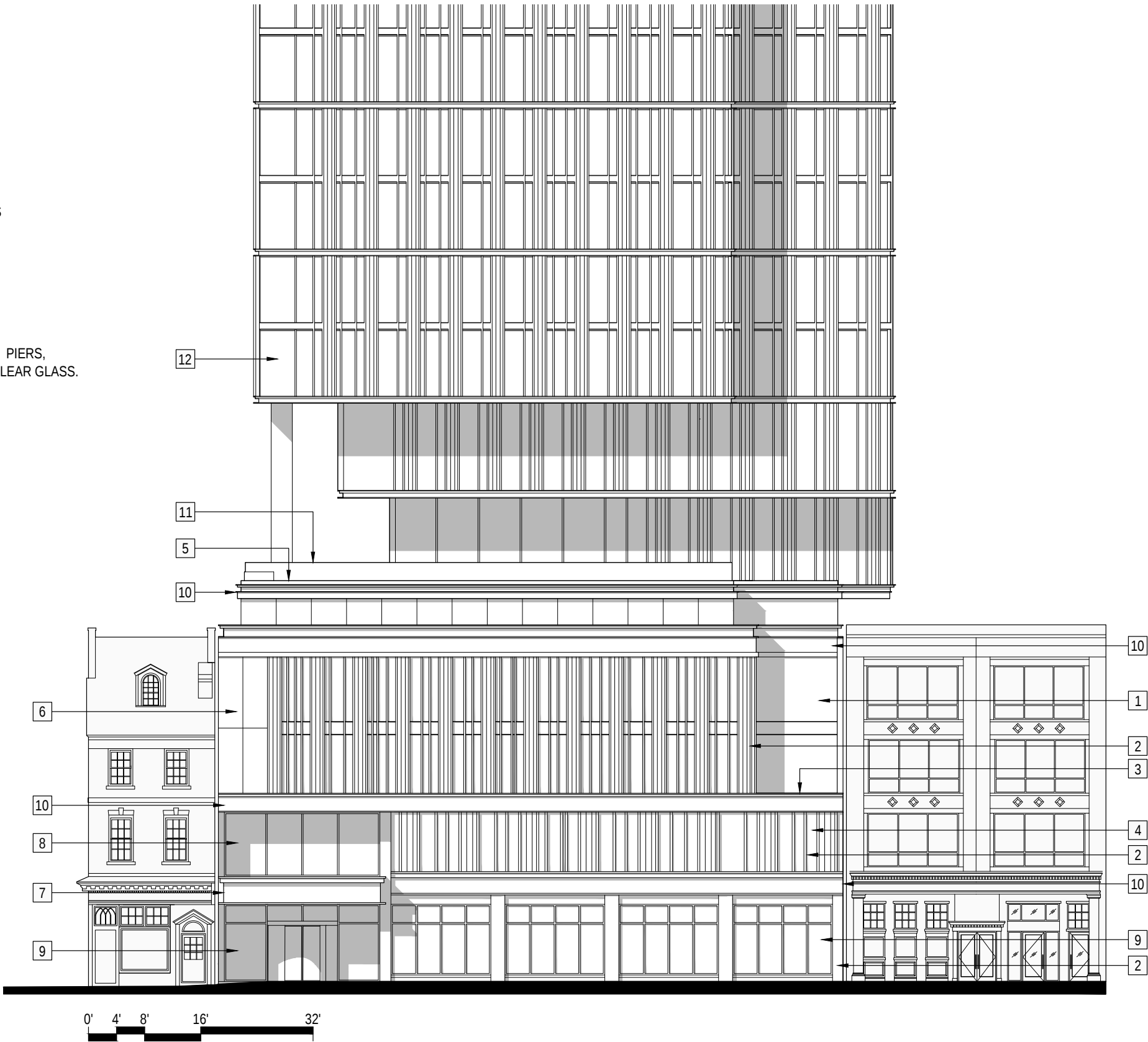
SHEET NOTES:

- 1. GREEN WALL
- 2. VERTICAL ALUMINUM CLAD PIERS
- 3. GREEN ROOF
- 4. TRANSLUCENT GLAZING AT PARKING LEVELS
- 5. PLANTERS AT ROOF EDGE
- 6. ACM PANEL SYSTEM WITH REVEALS
- 7. ACM CANOPY
- 8. STOREFRONT WITH TRANSLUCENT GLASS
- 9. STOREFRONT WITH CLEAR GLASS
- 10. ACM TRIM BANDS
- 11. GLASS GUARDRAIL AT AMENITY TERRACE
- 12. WINDOW WALL SYSTEM WITH VERTICAL ACM PIERS, HORIZONTAL ACM TRIM BANDS AND CLEAR CLEAR GLASS.



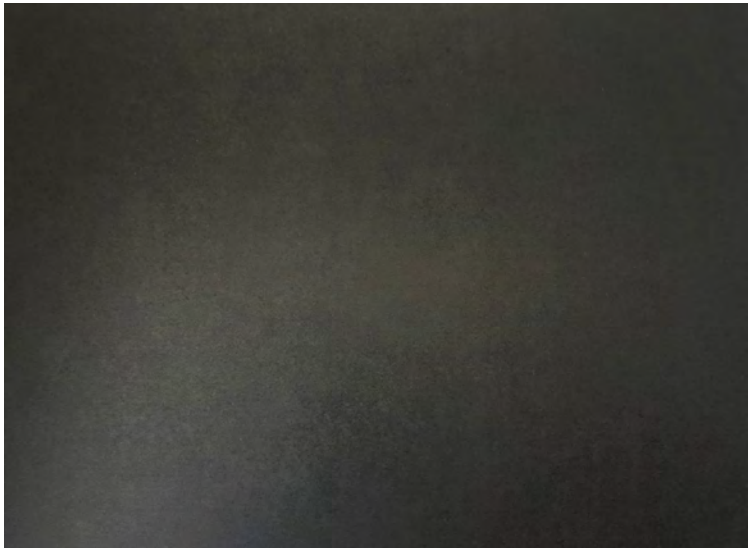
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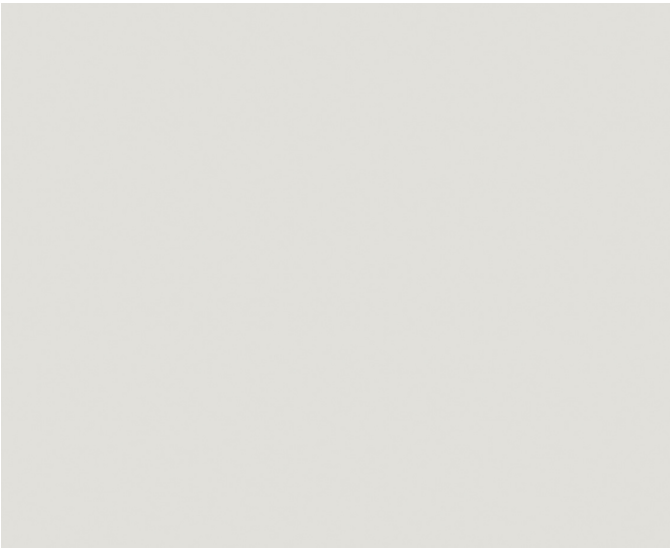




Metal Panels - Terracotta Color
Location: Vertical Ribbed Piers



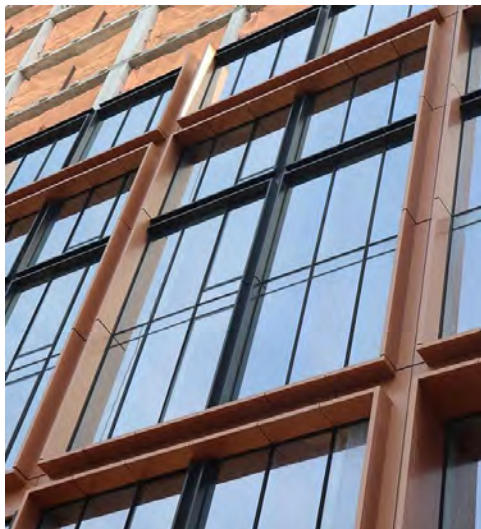
Metal Accents - Dark Bronze Color
Location: Slab Covers, Metal Accents, Window Frames



Metal Soffit Panels - Alabaster Color
Location: Soffits



Acrylic Panels
Location: Motor Court Wall Cladding



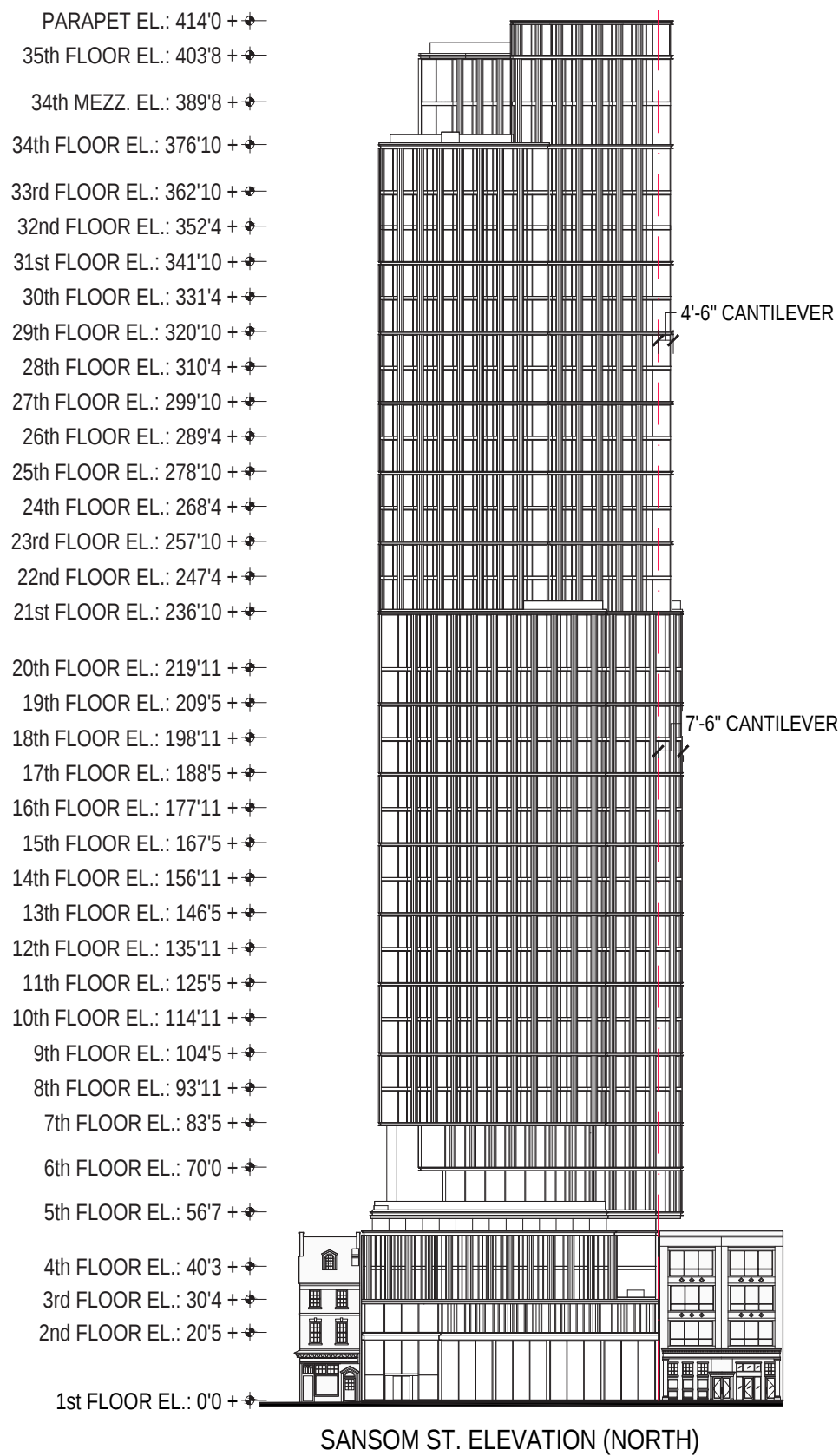
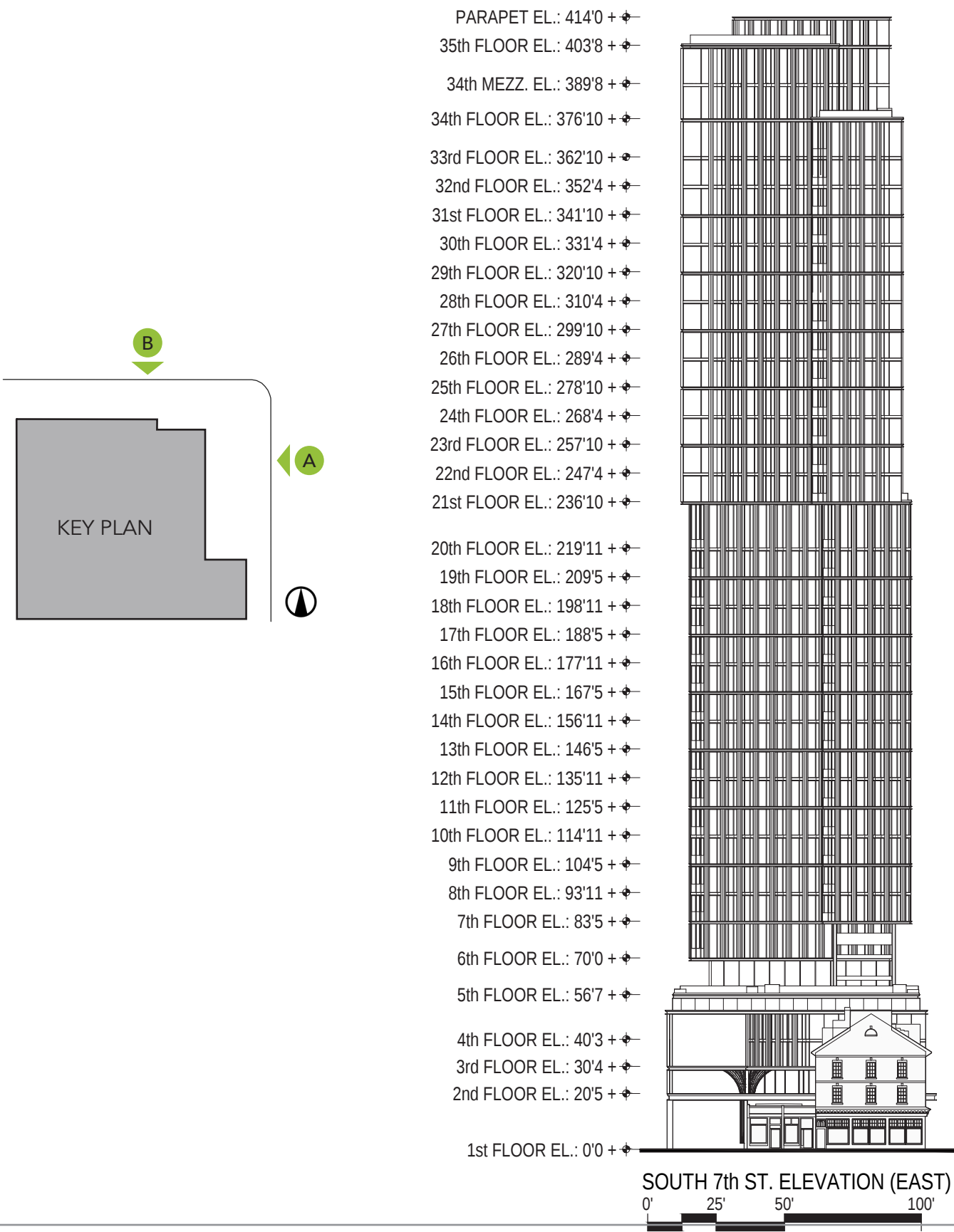
Unitized Window Wall Example
Location: Typical Facade

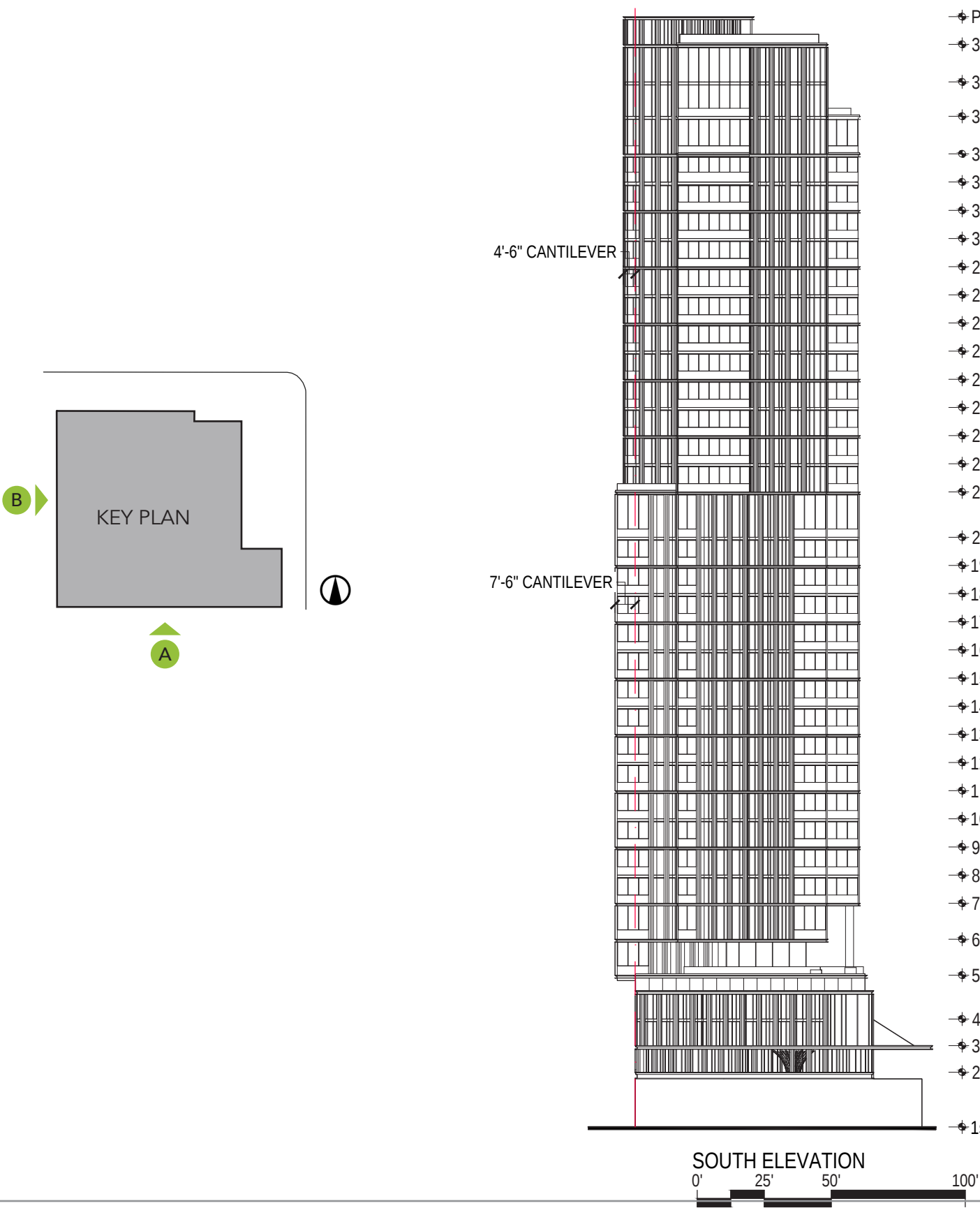


Glass Railing System Example
Location: Typical Balcony Rails

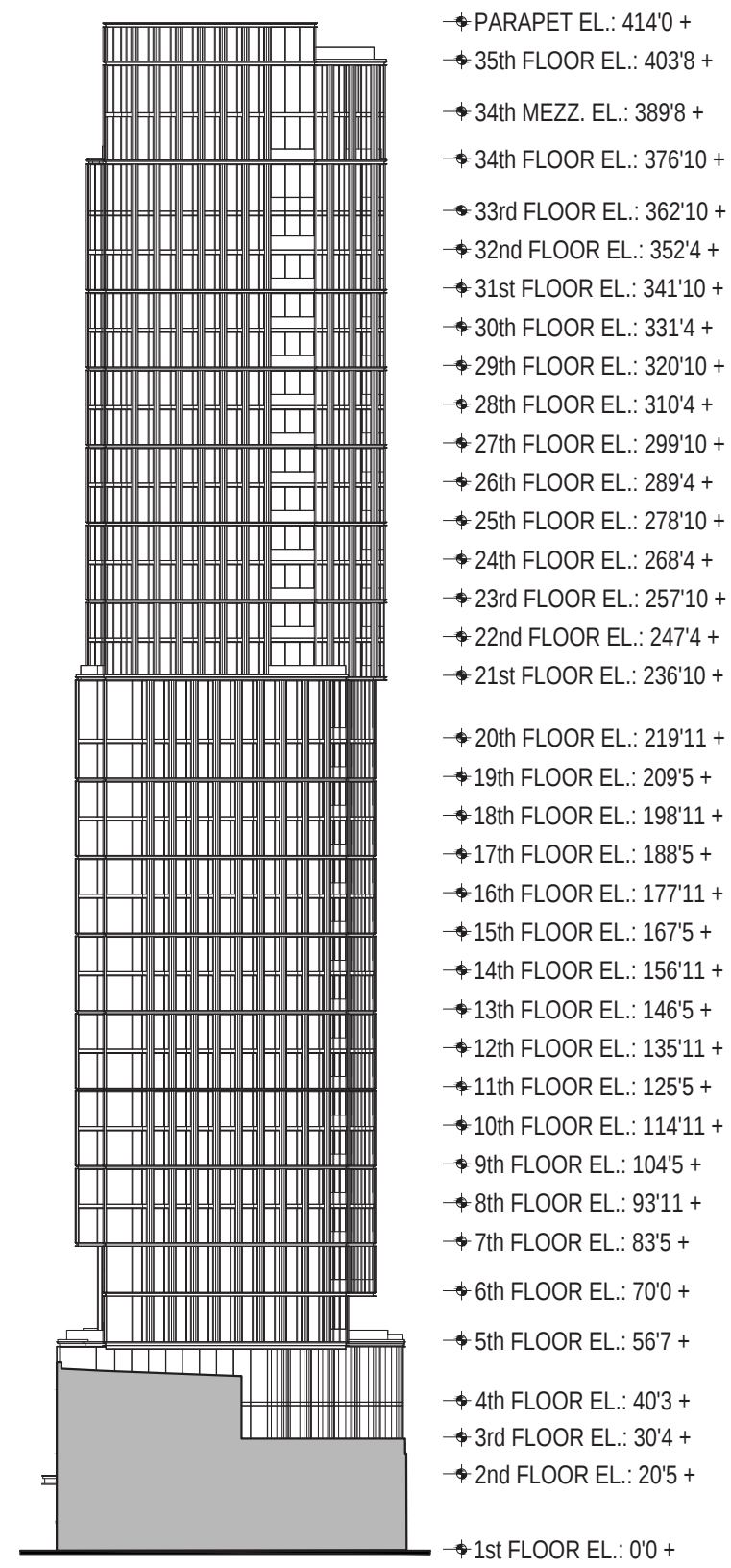


Metal Accents - Brass Color
Location: Accent Color

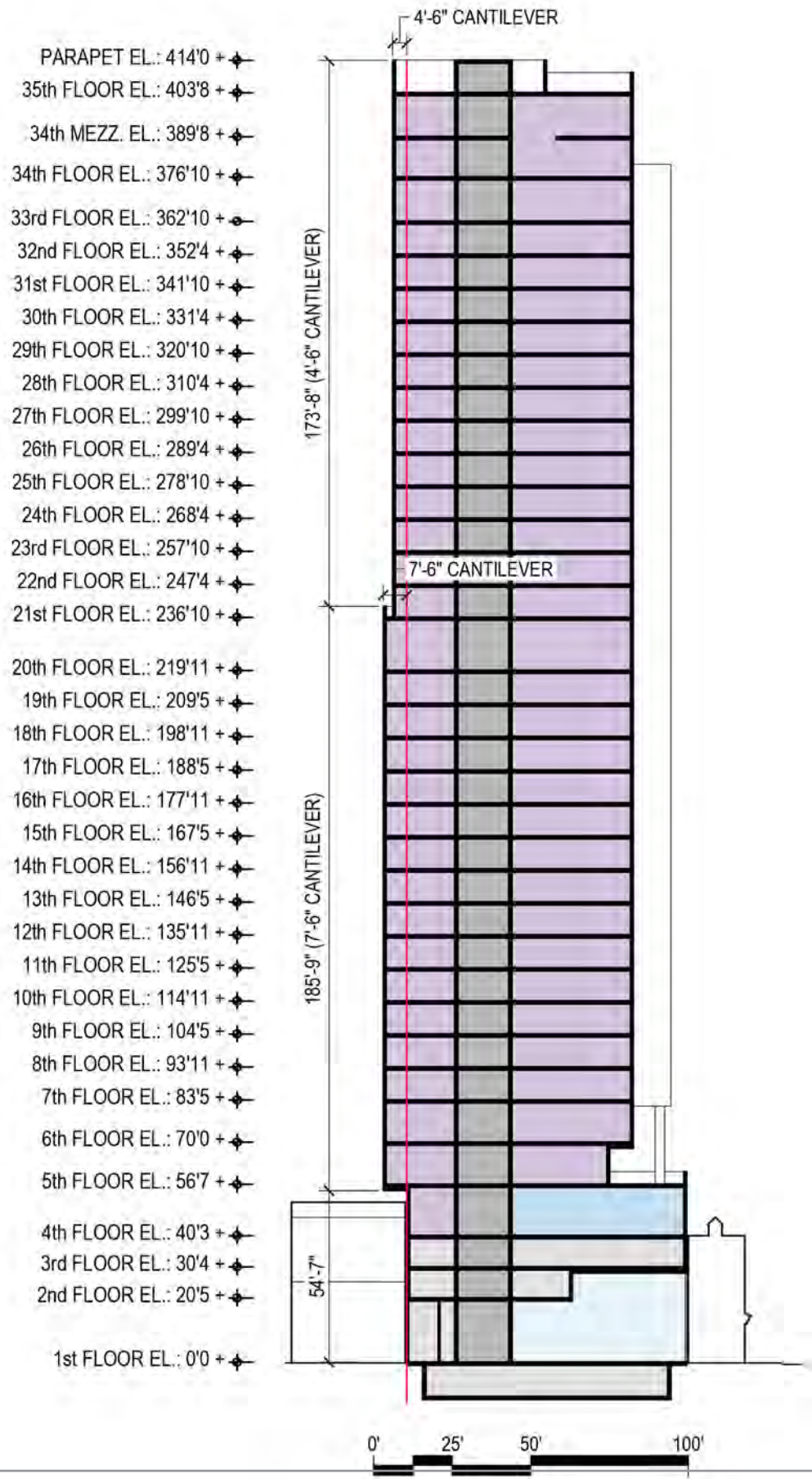
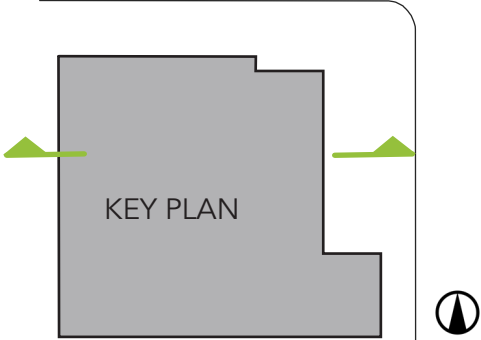


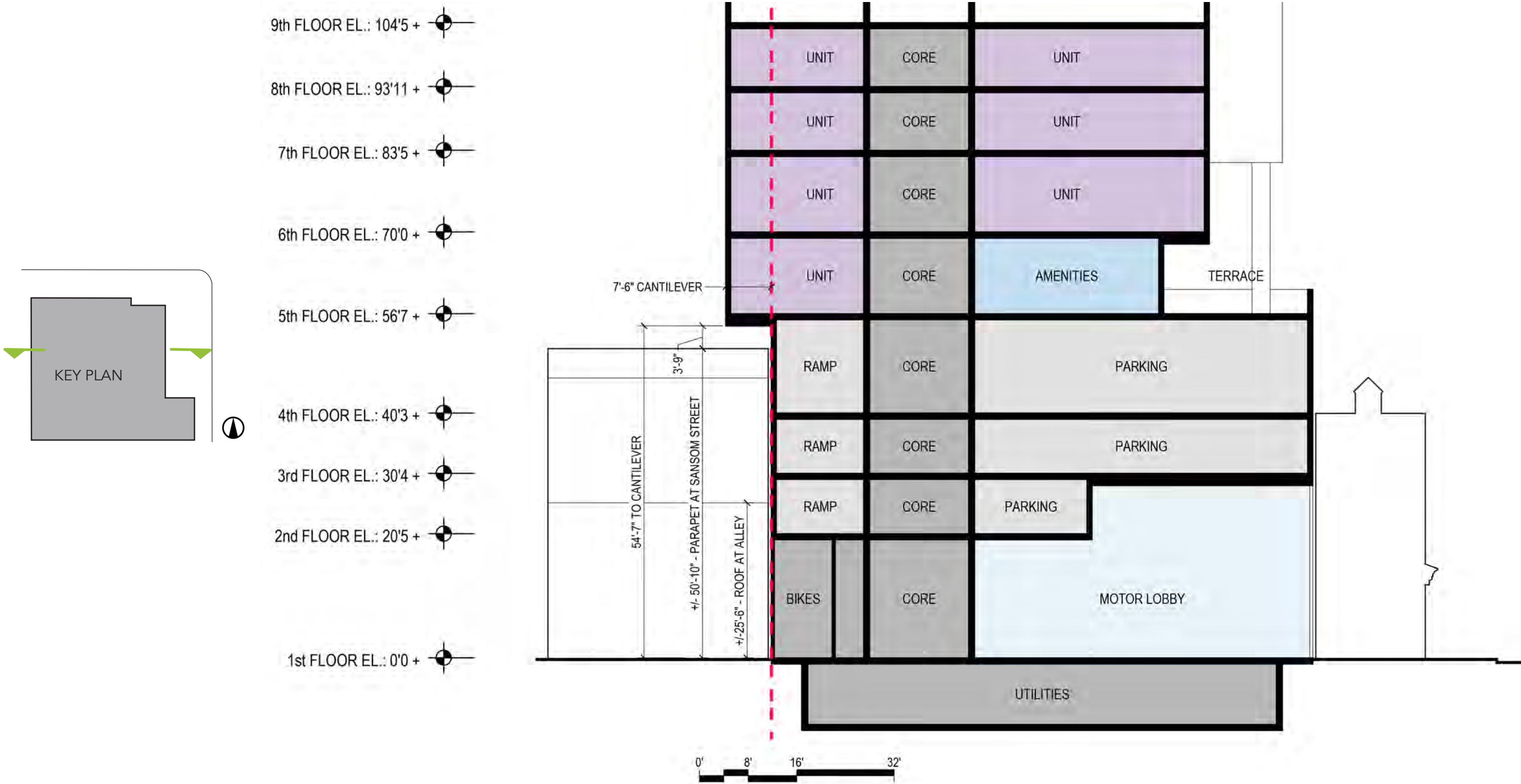


- PARAPET EL.: 414'0 +
- 35th FLOOR EL.: 403'8 +
- 34th MEZZ. EL.: 389'8 +
- 34th FLOOR EL.: 376'10 +
- 33rd FLOOR EL.: 362'10 +
- 32nd FLOOR EL.: 352'4 +
- 31st FLOOR EL.: 341'10 +
- 30th FLOOR EL.: 331'4 +
- 29th FLOOR EL.: 320'10 +
- 28th FLOOR EL.: 310'4 +
- 27th FLOOR EL.: 299'10 +
- 26th FLOOR EL.: 289'4 +
- 25th FLOOR EL.: 278'10 +
- 24th FLOOR EL.: 268'4 +
- 23rd FLOOR EL.: 257'10 +
- 22nd FLOOR EL.: 247'4 +
- 21st FLOOR EL.: 236'10 +
- 20th FLOOR EL.: 219'11 +
- 19th FLOOR EL.: 209'5 +
- 18th FLOOR EL.: 198'11 +
- 17th FLOOR EL.: 188'5 +
- 16th FLOOR EL.: 177'11 +
- 15th FLOOR EL.: 167'5 +
- 14th FLOOR EL.: 156'11 +
- 13th FLOOR EL.: 146'5 +
- 12th FLOOR EL.: 135'11 +
- 11th FLOOR EL.: 125'5 +
- 10th FLOOR EL.: 114'11 +
- 9th FLOOR EL.: 104'5 +
- 8th FLOOR EL.: 93'11 +
- 7th FLOOR EL.: 83'5 +
- 6th FLOOR EL.: 70'0 +
- 5th FLOOR EL.: 56'7 +
- 4th FLOOR EL.: 40'3 +
- 3rd FLOOR EL.: 30'4 +
- 2nd FLOOR EL.: 20'5 +
- 1st FLOOR EL.: 0'0 +

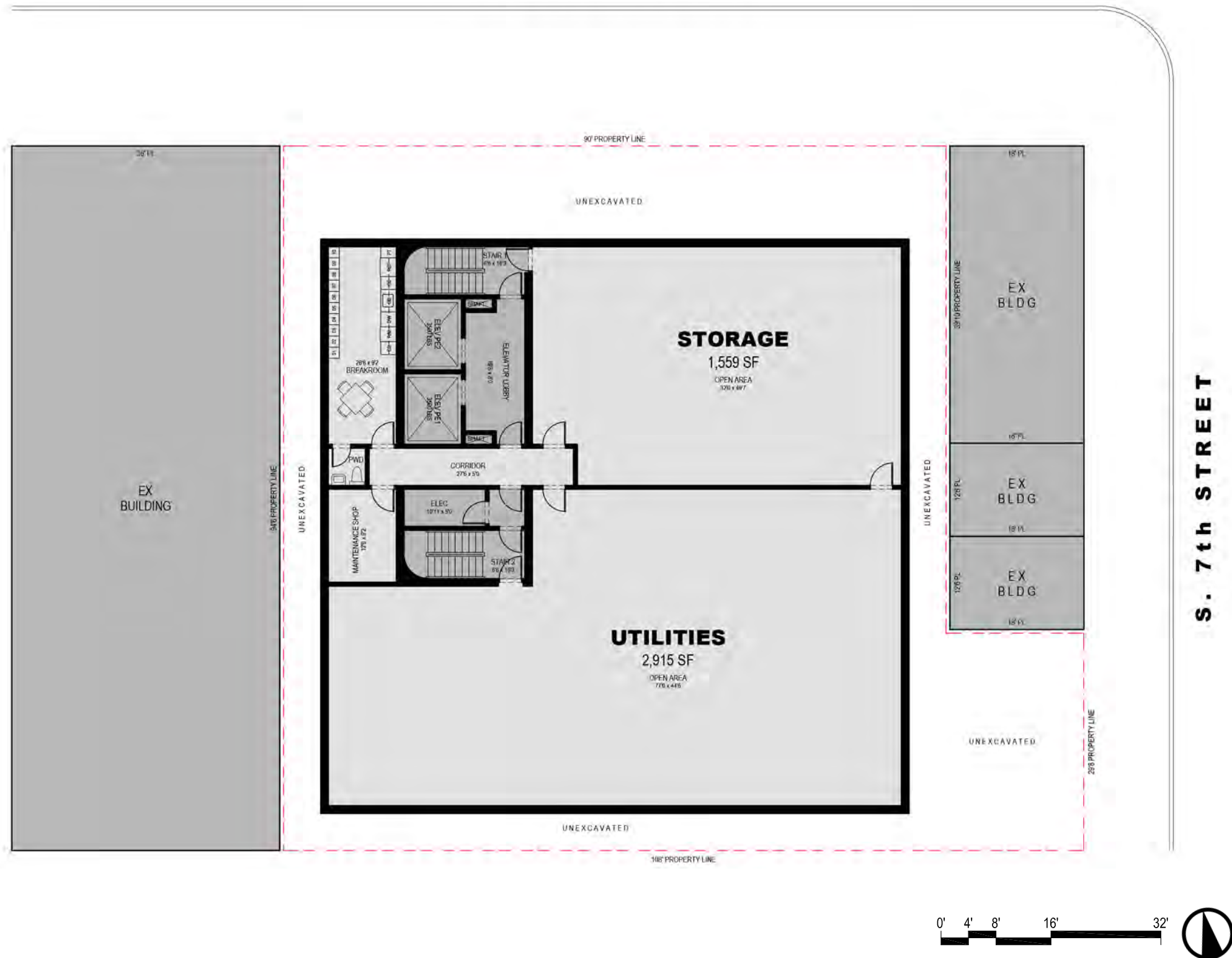


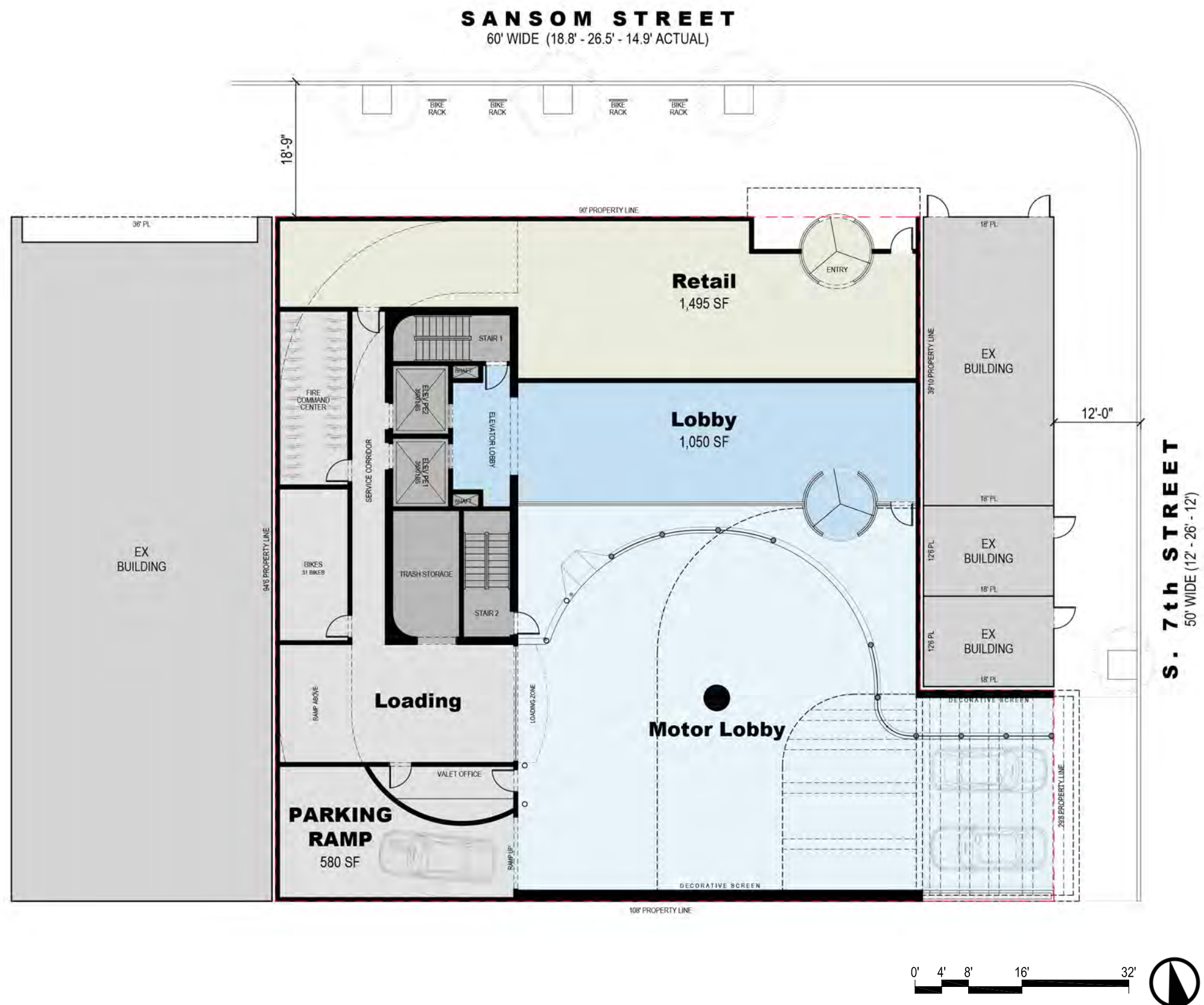
- PARAPET EL.: 414'0 +
- 35th FLOOR EL.: 403'8 +
- 34th MEZZ. EL.: 389'8 +
- 34th FLOOR EL.: 376'10 +
- 33rd FLOOR EL.: 362'10 +
- 32nd FLOOR EL.: 352'4 +
- 31st FLOOR EL.: 341'10 +
- 30th FLOOR EL.: 331'4 +
- 29th FLOOR EL.: 320'10 +
- 28th FLOOR EL.: 310'4 +
- 27th FLOOR EL.: 299'10 +
- 26th FLOOR EL.: 289'4 +
- 25th FLOOR EL.: 278'10 +
- 24th FLOOR EL.: 268'4 +
- 23rd FLOOR EL.: 257'10 +
- 22nd FLOOR EL.: 247'4 +
- 21st FLOOR EL.: 236'10 +
- 20th FLOOR EL.: 219'11 +
- 19th FLOOR EL.: 209'5 +
- 18th FLOOR EL.: 198'11 +
- 17th FLOOR EL.: 188'5 +
- 16th FLOOR EL.: 177'11 +
- 15th FLOOR EL.: 167'5 +
- 14th FLOOR EL.: 156'11 +
- 13th FLOOR EL.: 146'5 +
- 12th FLOOR EL.: 135'11 +
- 11th FLOOR EL.: 125'5 +
- 10th FLOOR EL.: 114'11 +
- 9th FLOOR EL.: 104'5 +
- 8th FLOOR EL.: 93'11 +
- 7th FLOOR EL.: 83'5 +
- 6th FLOOR EL.: 70'0 +
- 5th FLOOR EL.: 56'7 +
- 4th FLOOR EL.: 40'3 +
- 3rd FLOOR EL.: 30'4 +
- 2nd FLOOR EL.: 20'5 +
- 1st FLOOR EL.: 0'0 +



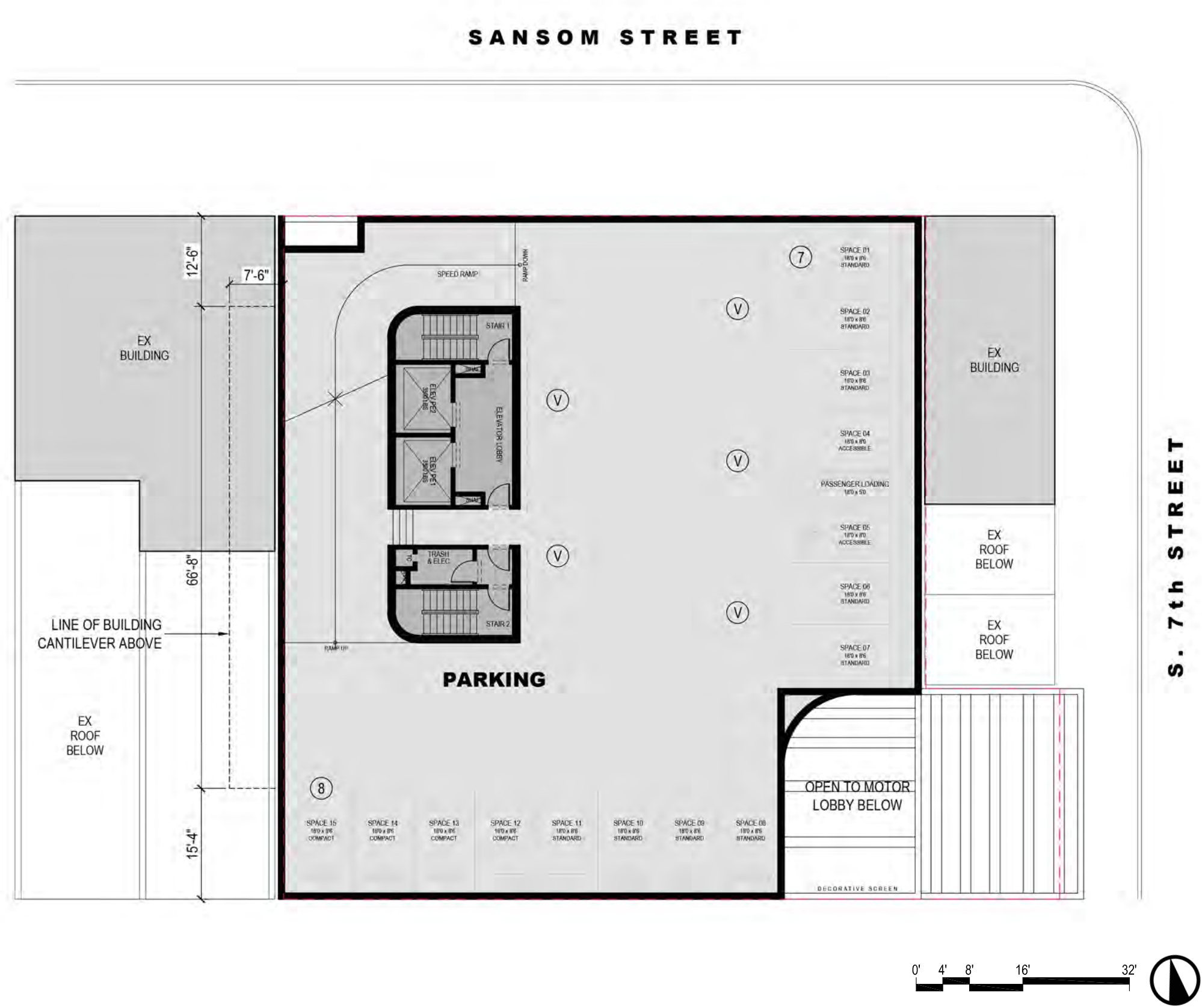


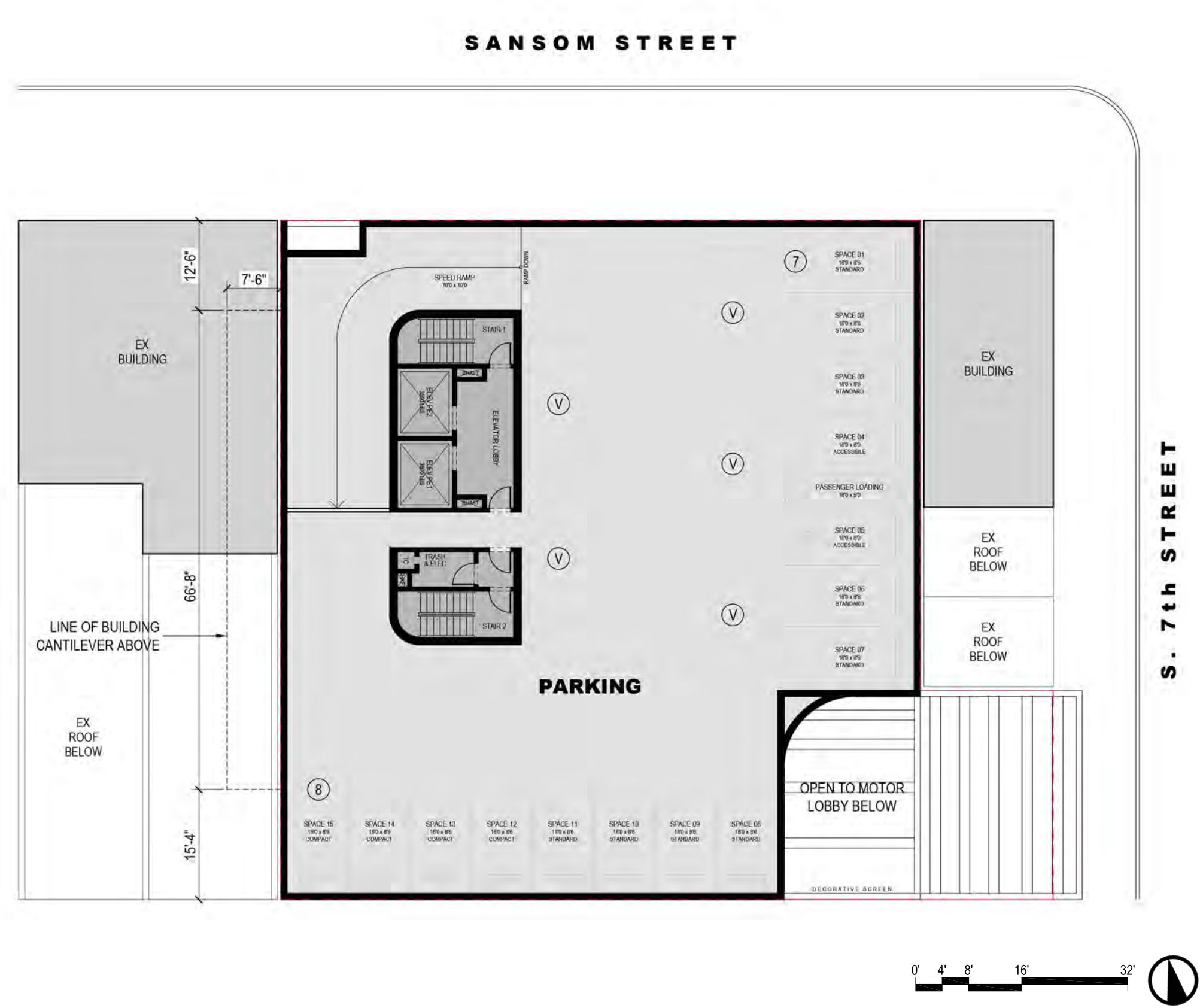
SANSOM STREET

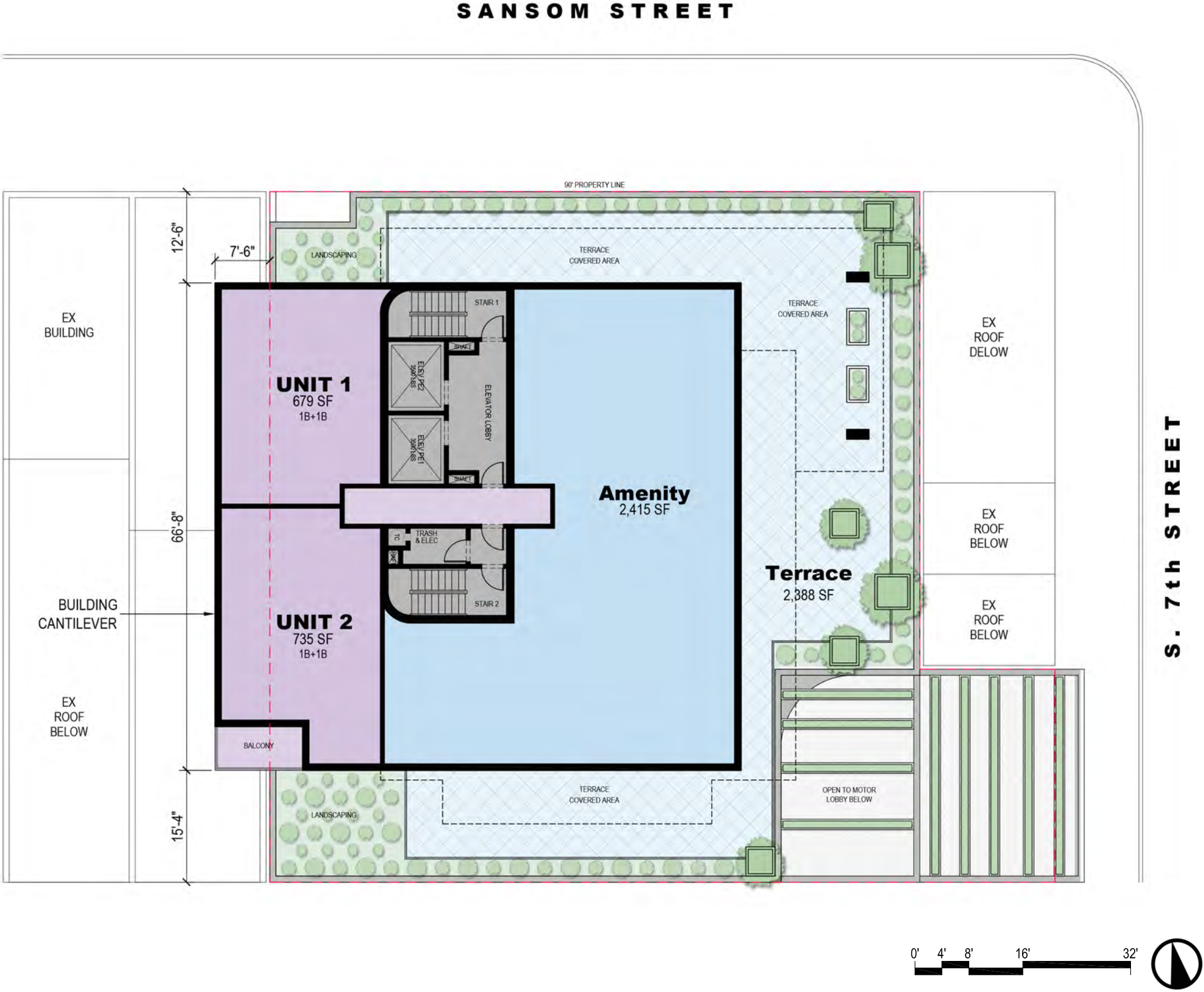


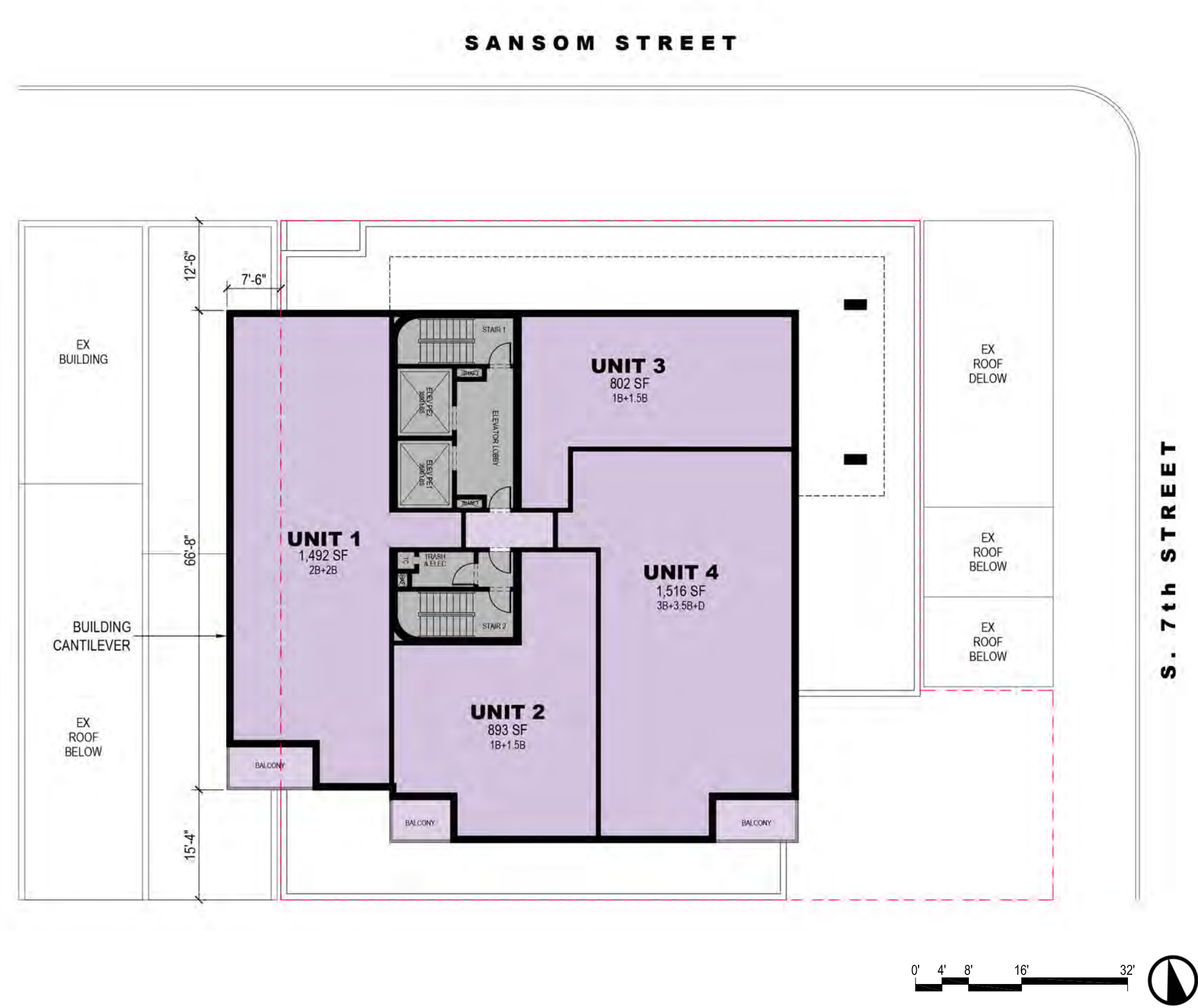


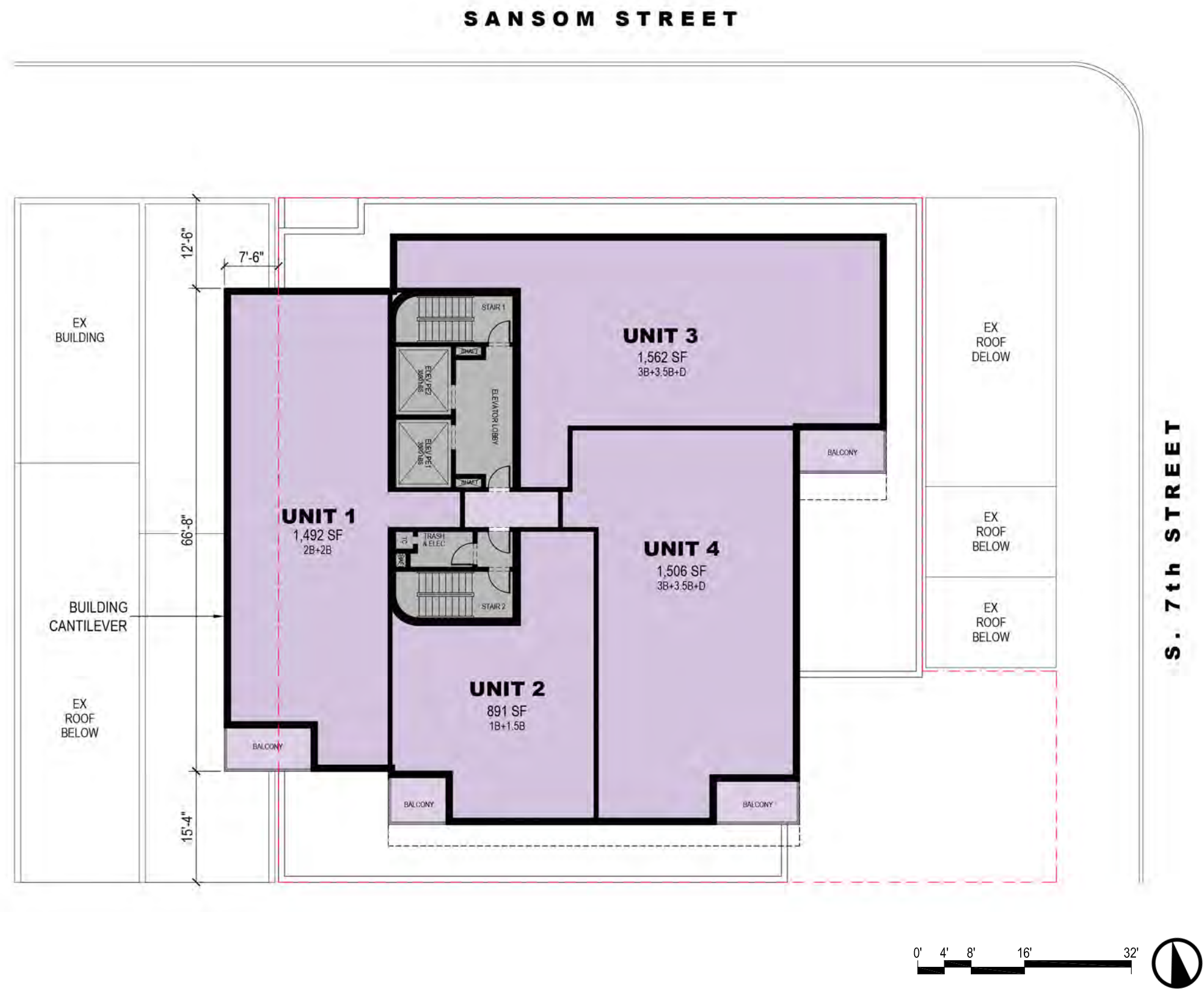


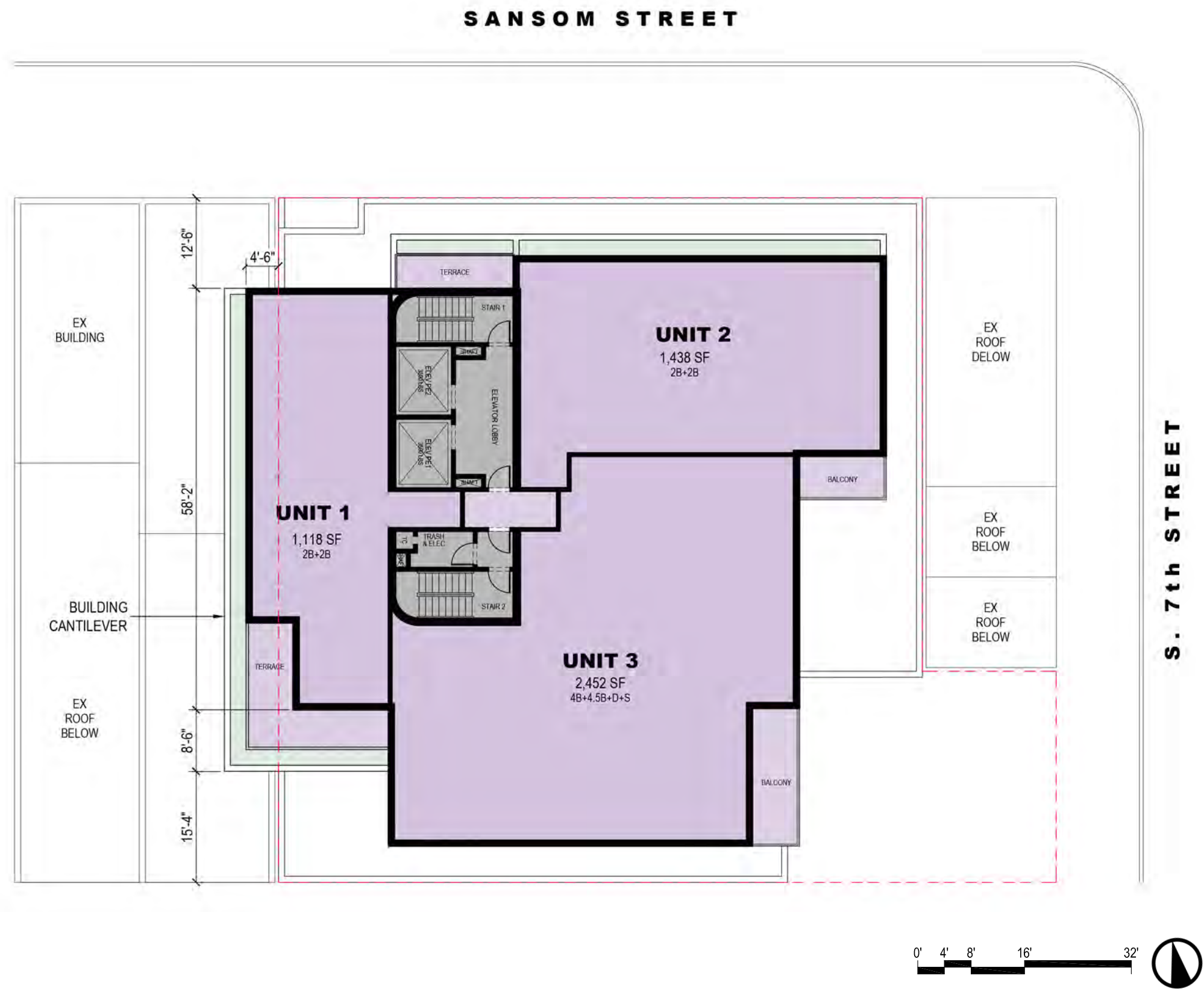


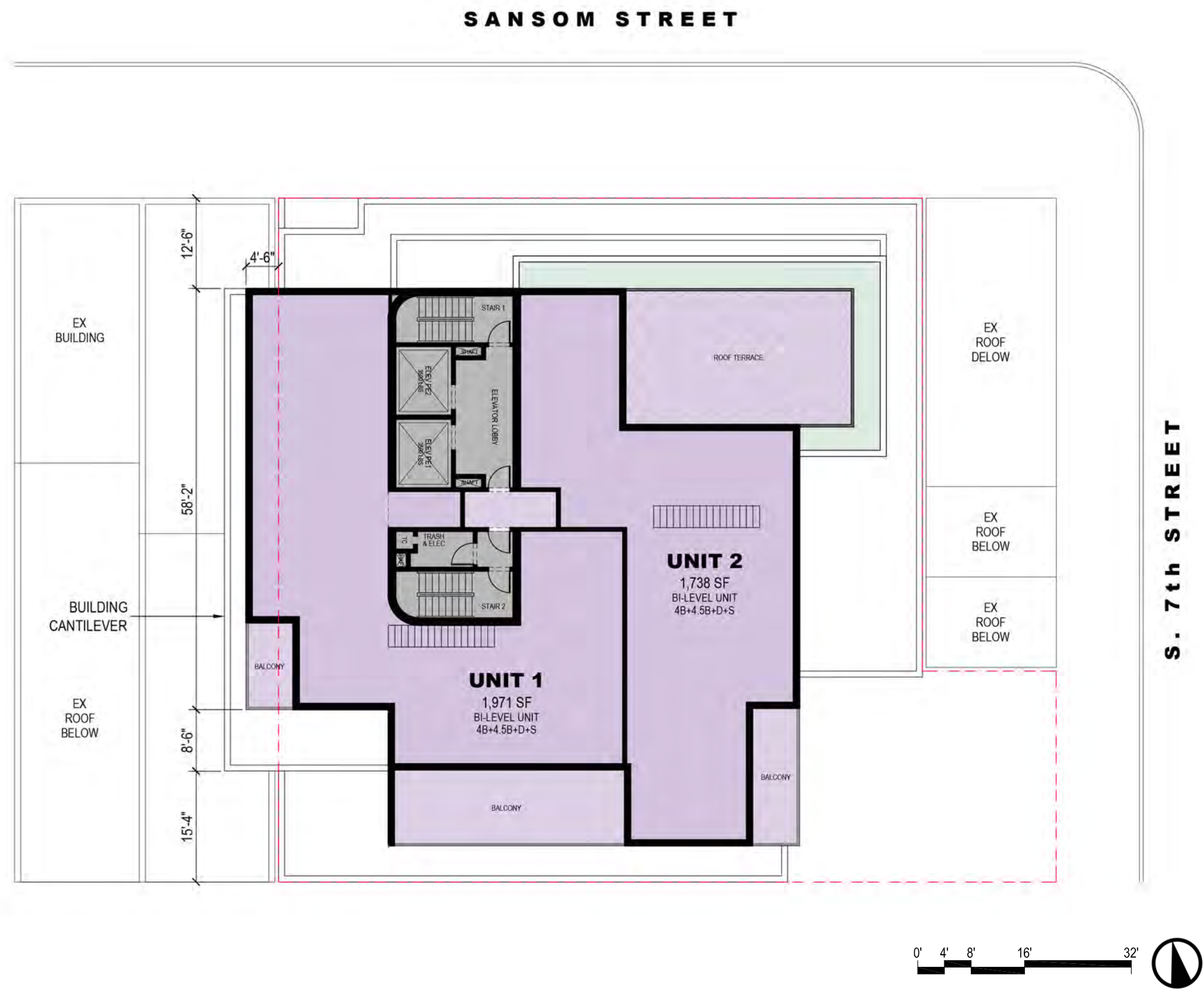




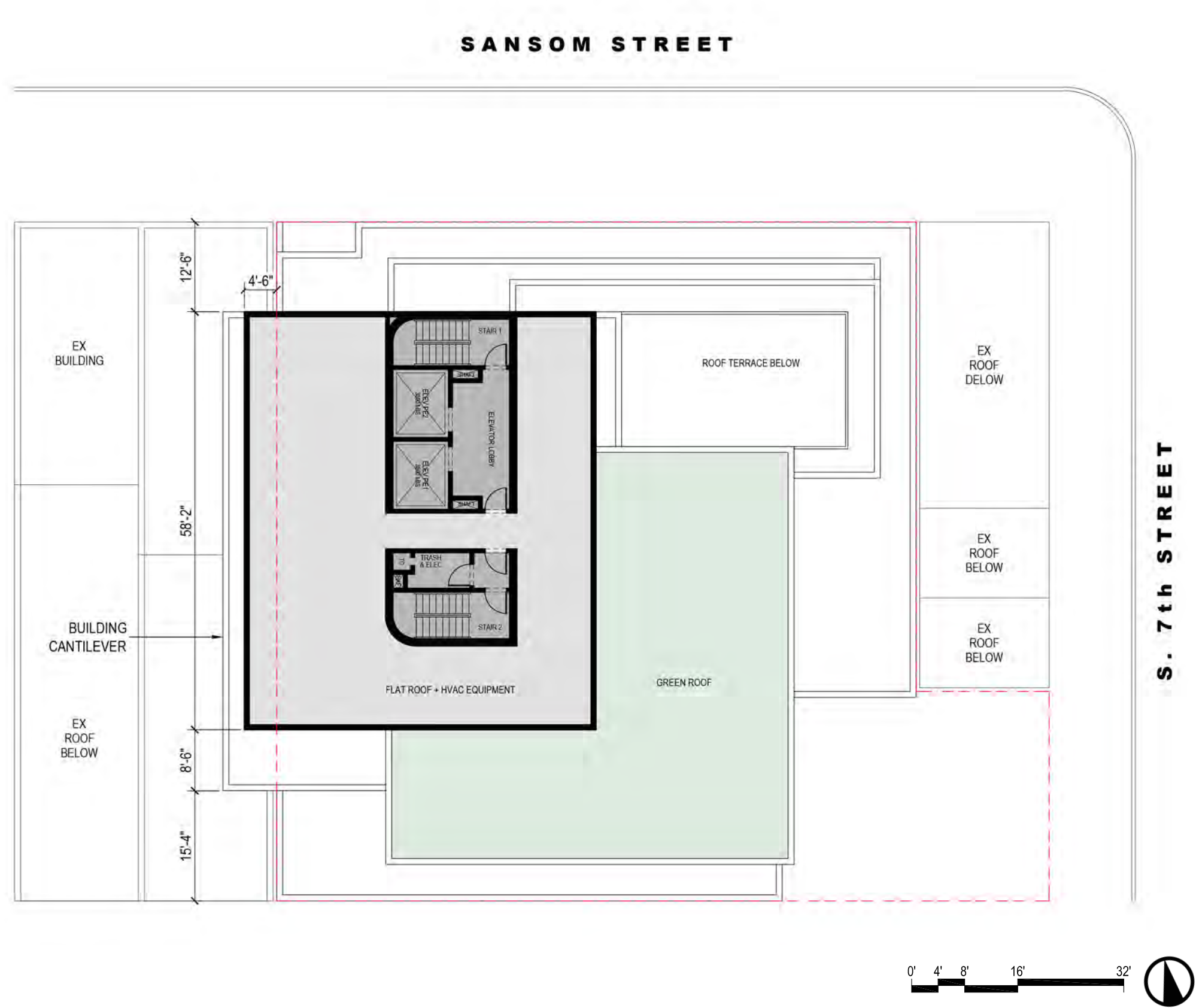


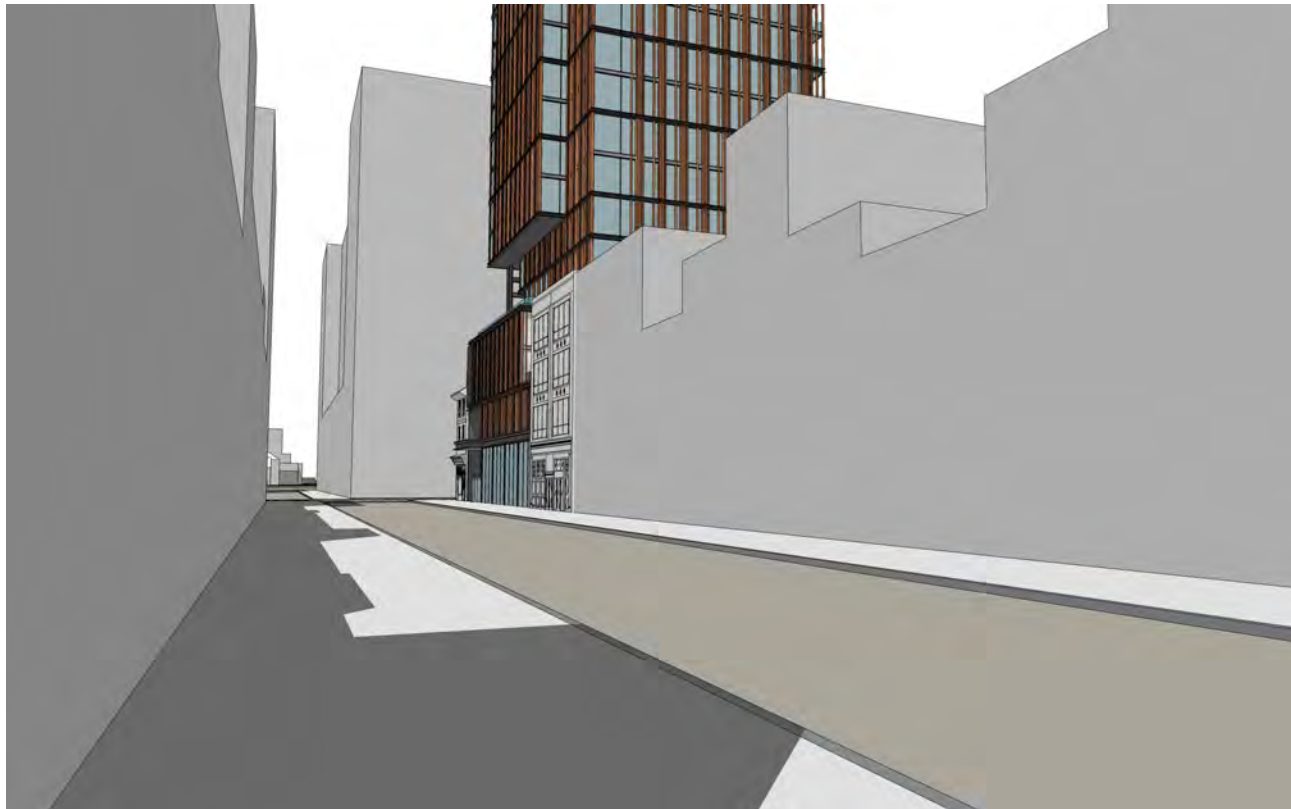














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