

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

# Manayunk Neighborhood Council, PO Box 4667, Philadelphia, PA 19127

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Philadelphia Historical Commission  
1515 Arch Street  
Philadelphia, PA 19102

April 19, 2024  
**Re: 4045-61 Main Street**

Dear Members of the Historical Commission

Summary of Manayunk Neighborhood Council's written testimony.

- The the proposed building is profoundly out of scale with Manayunk and Manayunk's historic character. **We ask that the Architectural Committee recommend denial in pursuit of a better mixed use plan that includes (real) preservation of historic elements and a scale and design compatible with the Main Street Historic District.**
- It is acknowledge that the site is in an area that floods regularly and that all preserved and redeveloped areas will have to take that into account.
- We were deeply disappointed and disturbed by the staff recommendation for the complete demolition of the site and the concurrence by the Committee on Financial Hardship. We believe that none of the arguments, reasoning, evidence or expert testimony support the complete demolition of the site and that that recommendation should be disregarded or the case sent back for re-evaluation.

In this document we refer to the Main Street Historic District. This is sections A and B of the Main Street/Manayunk and Venice Island Historic District. These are the sections that cover Main Street from Leverington Avenue to Ridge and Main.

## **Regarding decision of the Staff Recommendation and the Decision of the Committee on Financial Hardship**

We gave testimony at the hardship hearing and we won't repeat all of it here. Some more detail can be found in our letter and testimony which are included as attachments.

Every letter in support of a case for demolition makes their arguments from the same set of fallacies (CBP Architects, AKRF, Econsult Solutions, JLL, AVISON YOUNG)

- If the site is re-used for a particular purpose the whole site must be re-used for that purpose.
- If there is any preservation the whole site must be preserved and flood-proofed to modern standards.
- If there is preservation, each preserved aspect will exist in a vacuum with no common resources.
- The collection of buildings is a house of cards so complex no individual piece can be preserved.
- The only reasonable alternative is putting over 200 people in a seven story structure with six million+ dollars worth of cars and thousands of gallons of gas in an area that floods frequently. Before everyone shouts it won't happen here, we only have to look to (now) Apex at the other end of Main Street which, after three owners, is managed by a firm in California who's response to Ida was to send an email warning in the middle of the night resulting in trapped residents and dozens of flooded cars.

- Tropical Storm Ida is representative of a new normal.

**We will show that the reports, and therefore the staff recommendations, are based on faulty and misleading flood levels. Misrepresenting actual flood levels by as much as five feet.**

**The site contains a series of building and infill built over a period of time. There is no consideration of individual structures and preservation of key significantly contributing structures along side, and integrated with, new construction with mixed commercial and residential. For example.**

This property is on the National Register of Historic Places Inventory and has been given their highest rating **A -- Significant Building or Structure**

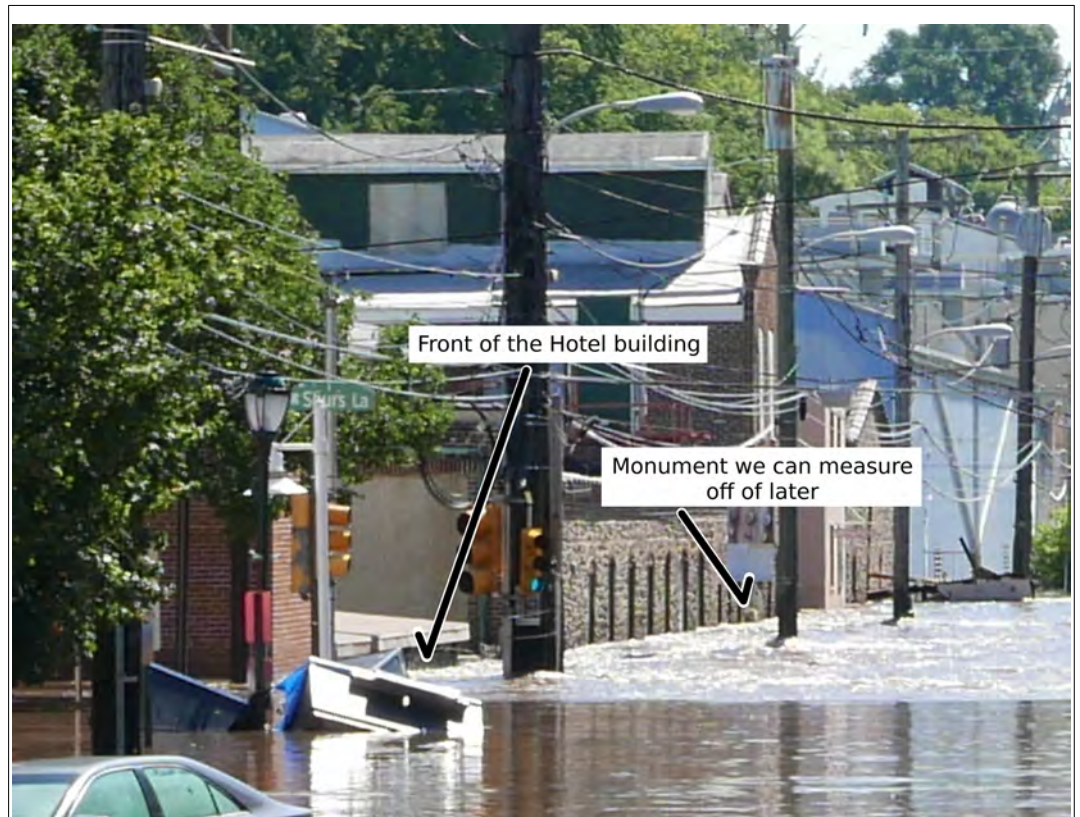
- The hotel building at Shurs and Main is from before 1850
- Other mill buildings starting in 1869 when Littlewood's first began operation. Details are unknown and they weren't investigated or documented by the committee.

The reports spend a lot of time on the Design Flood Elevation (DFE) standard and usable space above the DFE. But Ida was not a 100 year flood. It was more. The 100 year flood level as defined at Gage Station 01474500 over from Boathouse Row is 15.5 feet. Ida topped out at 16.35 feet. Almost 20% more than the level change from "Flood Level" at 11 feet to Major Flood at 15.5 feet. This was the second highest flood level in Philadelphia recorded history, only topped by the October 1869 flood at 17 feet. Just when Littlewood's was getting started.

In a recent Philadelphia Inquirer article Nate Hommel, director of planning and design with the University City District describes Ida as 400 year storm (*Water park with pool and beach are envisioned for Schuylkill riverfront near 30th Street Station*, April 18, 2024).

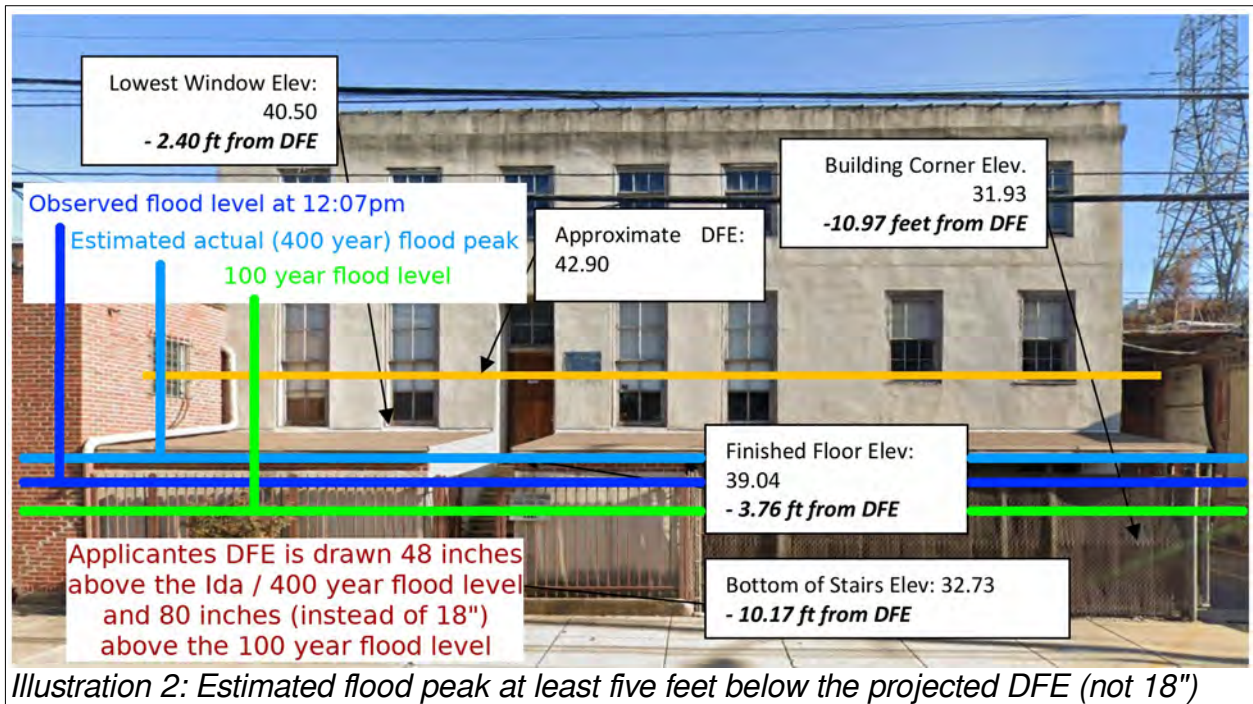
We know the actual flood level, during Ida, at this property, from our own photograph (Kevin Smith 09/02/2021 at 12:07 PM). From that we can show the actual flood levels from Ida and determine that an actual 100 year flood would have been as much as 2.5 feet lower.

We are not suggesting that the currently computed values should be discarded but they perhaps should be reevaluated based on real data. We are suggesting that realistically there is very usable floor space in several of the existing buildings that make up the collection currently on the site that can and should be considered based on known real world conditions.

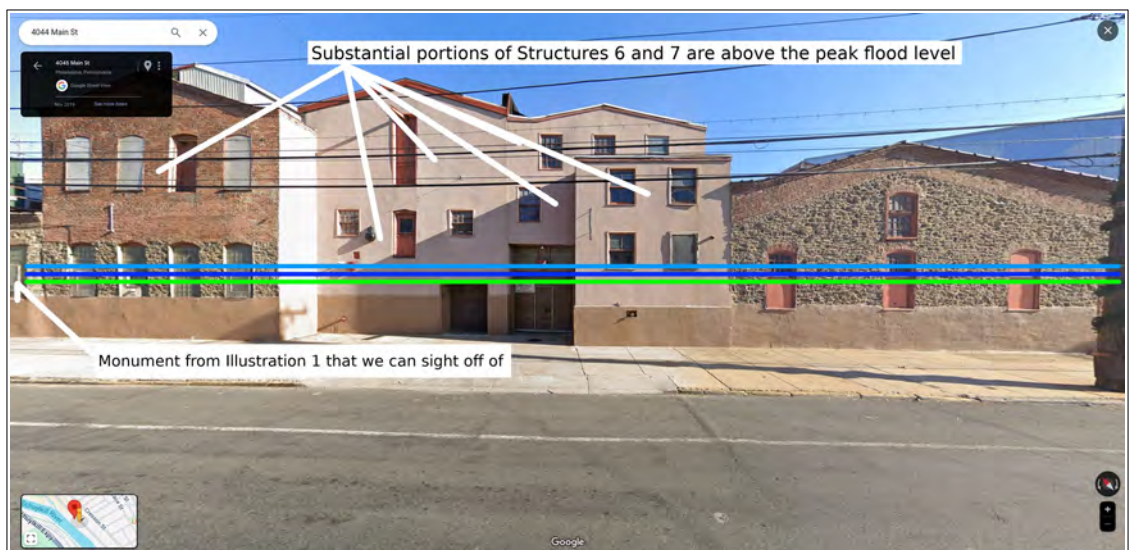
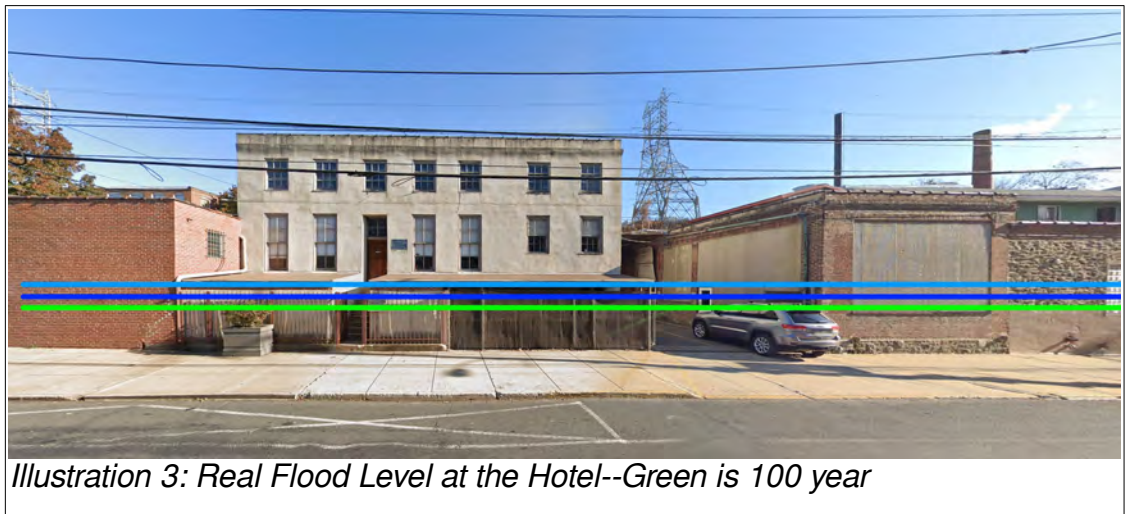


*Illustration 1: Flood level at 4045 Main at 12:07 pm. Flood peaked at 8:15 but according to the Green Lane Bridge flood gauge, at 12:07pm the water level was only down 1' 2" from the peak.*





As we have mentioned this flood well over the level 100 year flood level (purportedly a 400 year flood). As can be seen in Illustration 2 The Design Flood Elevation used in the applicant's submission is 48" higher than the actual flood peak. It is 6.7"/80" above the 100 year flood level. More than 5' over what the required 18". This calls into question all the presumptions about useful floors.



Finally, the analysis of Historical Committee Staff appears to adopt the applicant's position in whole. Staff Executive Director Jonathan Farnham, when asked to expand the staff's recommendation for hardship he commented (taken from the minutes of the the hardship committee meeting).

*Mr. Farnham noted that the staff had recommended that the Historical Commission find that this complex of buildings cannot be reasonably adapted for any new purpose. He referenced an image of the complex that was displayed on the screen and asked the Committee members to imagine the design flood elevation line that was shown in bright yellow on images displayed by the applicant's consultants. It would run across the complex at more than 13 feet above the sidewalk along Main Street. All occupied space and utilities would need to be moved above that elevation to comply with floodplain regulations and make the existing buildings safely and feasibly reusable. Most of the buildings in the complex are one-story structures, a few with upper floors and lofts. The floors would need to be raised about 13 feet above ground level, which would not be possible in most of the buildings, leaving very little usable space where it would be possible. He concluded that, if this complex of buildings was located outside and above the floodplain, there would likely be good arguments that some parts of it could be feasibly, adaptively reused. However, when one accounts for the fact that it is in the floodplain and flooding appears to be occurring more and more often, and one acknowledges the limited amount of floor space in the complex that is above that floodplain line, then it seems obvious that there is no feasible reuse for the complex*

Staff echos the same fallacies from the applicants submission and ignores obvious opportunities.

- They appear to argue that if you can't reuse most of the site there is no point preserving any of it.
- They explicitly skip any individual evaluation of the buildings.
- They ignore the opportunity to consider preservation in context with new construction. For example shared utilities and access with adjacent more modern construction.
- They make assumptions and assertions about floor levels and areas without any inventory or accounting (I can find no inventory of structures, floors, etc. in the application).

We are also concerned that Staff is taking on the roll of climate scientists and flood experts. They are neither. Historical preservation should not be based on opinion, conjecture and unsubstantiated assertions about future flood conditions.

Flooding is real and climate change is real and while it maybe be thought of as common knowledge that flooding will become worse or has become worse. The fact is the effects of climate change are complicated and varied and will play out over decades and centuries and there are many contributors to flooding patterns, not the least of which are upstream land use decisions.

The considerations here should be how to preserve the most significant parts of the site based on real evidence for real world conditions.

The Committee on Financial hardship then asks that the "The property at 4045-61 Main Street should be recorded to HABS standards prior to any demolition." Only emphasizing the point that neither Staff nor the Committee had any real information of the makeup or history of the site and simple accepted the highly curated reports written by the developer. This kind of information should come first, not last.

**As we show in illustrations 5, 6 and 7 below we believe at least 30% of the developed site (current structures) could be preserved and re-purposed. Structure 1 and parts of structures 6 and 7 make up 20% of the developed site and have one or more floors above the real flood level. Structure 8 has possible the finest facade and a beautiful wooden truss ceiling. It makes up another 10% of the site and could be used for parking, an entrance for new construction, or some other flood tolerant use.**



# Littlewood's Preservation Opportunity

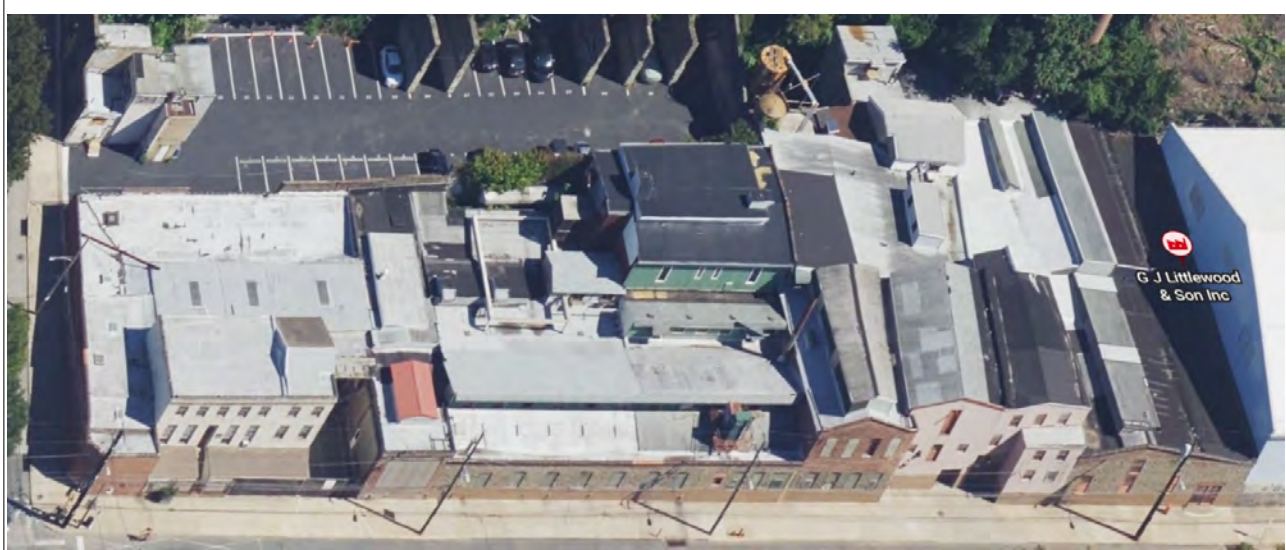


Illustration 5: Aerial View

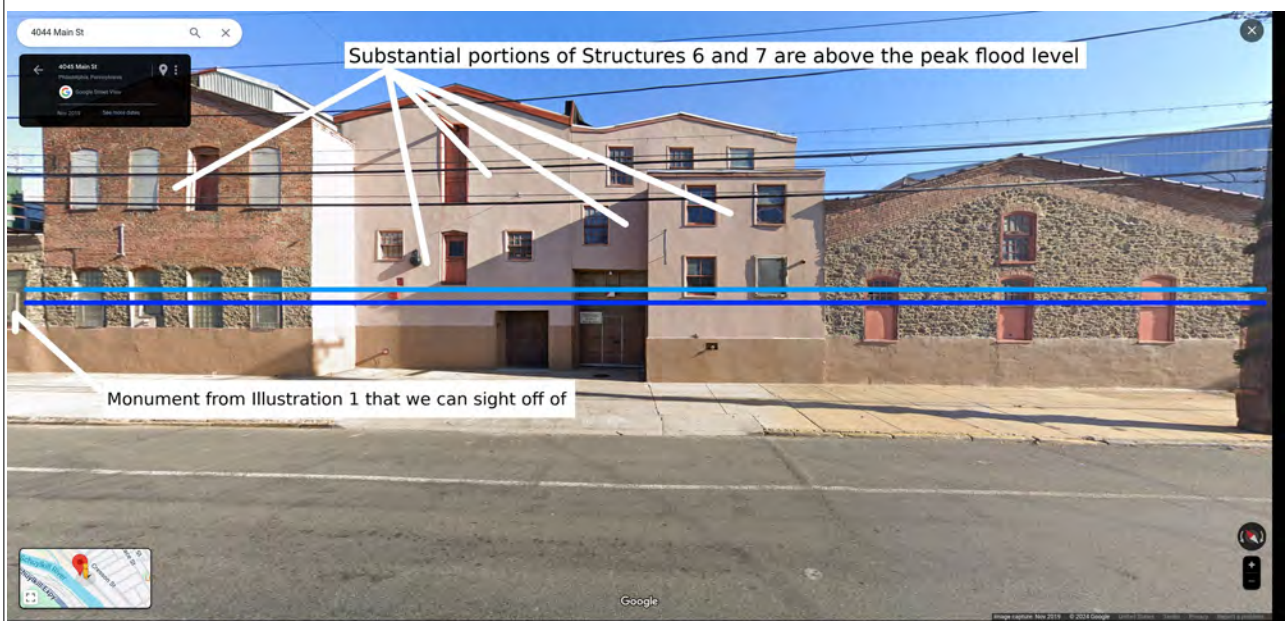


Illustration 6: Facades and Flood Level View

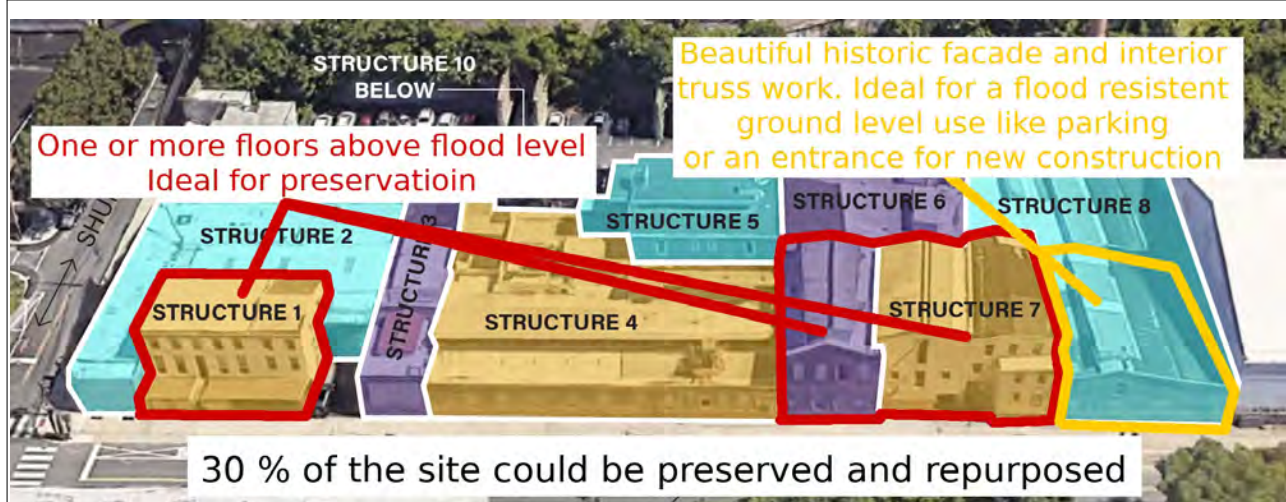


Illustration 7: Preservation Opportunities





*Illustration 8: Structure 6 upper floor well above any flood level*



*Illustration 9: Structure 7 second floor. Also a third floor above*



*Illustration 10: Structure 8 Roof and Trusses*



*Illustration 11: Structure 8 Roof and Trusses*





*Illustration 12: Pre-1850 Historic Hotel Building 3rd Floor*

The Econsult Solutions report shows the open third floor of the while noting the low ceilings and arguing against it's re-use as an AirBnB. It's not clear why they chose the straw-man argument about AirBnBs.

It is clear that the photo shows the significant floor space in the building. The second floor below is at least 30 inches over 100 year flood level with what appear to be 12 foot ceilings. It is currently divided into offices. With an open or reconfigured floor plan it could be serve any number of uses.

Beyond the above 3<sup>rd</sup> floor photo (captioned Third floor of office space – low ceilings by ESI) and a photo of an office on the second floor, the application shows only some of the open space in structure 4. It contains no interior photos, dimension or inventories of of any of the other significant structures on the property.

**We have to conclude that the Staff relied on a deeply flawed and deceptively simplified characterization of the property.**

**We believe any evaluation of this site should start (over) with a full evaluation of all the elements of the site and with a evidence based evaluation of the actual flood levels and risks.**

**We therefore ask that the Architectural Committee set aside the findings of the Committee on Financial Hardship when considering the preservation, re-use and development of the site.**



*Illustration 13: Pre-1850 Historic Hotel Building 2nd Floor Office with 12' Ceilings*

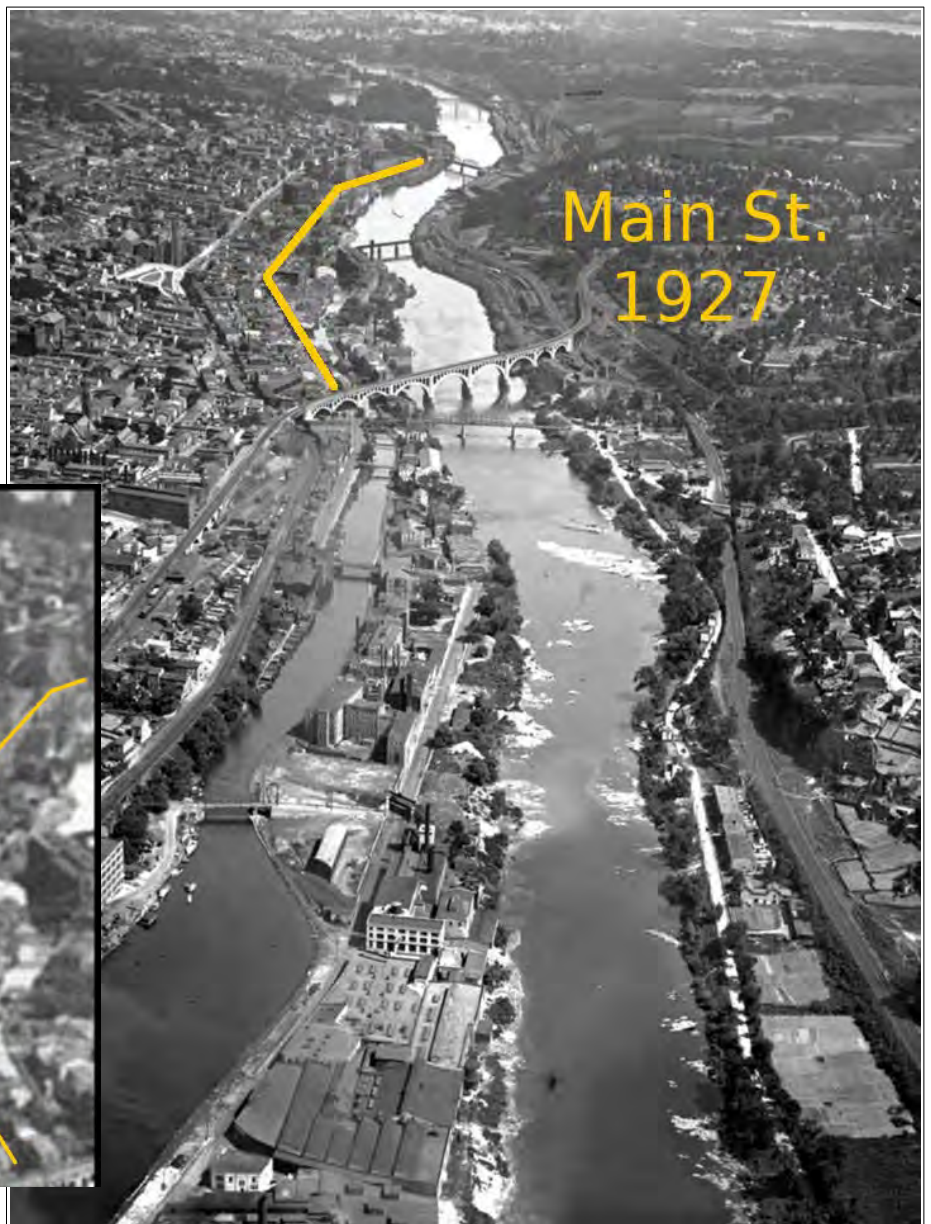
## Our comments to the Architectural Committee on the proposed residential development

Our comments are straightforward.

- The building is profoundly out scale in the Main Street Historic District. It is proposed taller than any other building in Manayunk (including the worst of the new developments). It is more massive than any other building in Manayunk (including the worst of the newer developments)
- The design and scale ignores or trivializes the historic character of Manayunk.
- The token retention of the old facades looks more like a toy train set and serves only to whitewash the disregard of the historic character of Manayunk and preservation of significant historic structures in the rest of the design.
- **We ask that the Architectural Committee recommend denial in pursuit of a better mixed use plan that includes (real) preservation of historic elements and with a scale and design compatible with the Main Street Historic District.**

The Main Street Historic District height restriction of 38 feet is from the Design Flood Elevation which is 18 inches above the Base Flood Elevation (flood level of a 100 year flood). For this site that varies from 10 to 14 feet. The project is already starting with a height bonus and they are, for no particular reason, asking for another 30+ feet of height.

While some of the older mills along the Manayunk Canal and on Venice Island were substantial in size, none were as tall, as long, and as wide as this proposed building. The large Richards Apex building, along the canal is only three stories on the Main Street side and is not visible from Main Street. It is still an active industrial site.





Main Street Manayunk, and just off of Main, have several mill buildings that represent the historic character of Manayunk. They are all significantly smaller and only three or four stories on

Main Street. There are many examples but the ones below are near by and are representative.

CHP Planning provided a report who's purpose was to show other large developments in the area. Unfortunately none of the examples are relevant to development on Main Street in this area of Manayunk. We will give details in the next section.

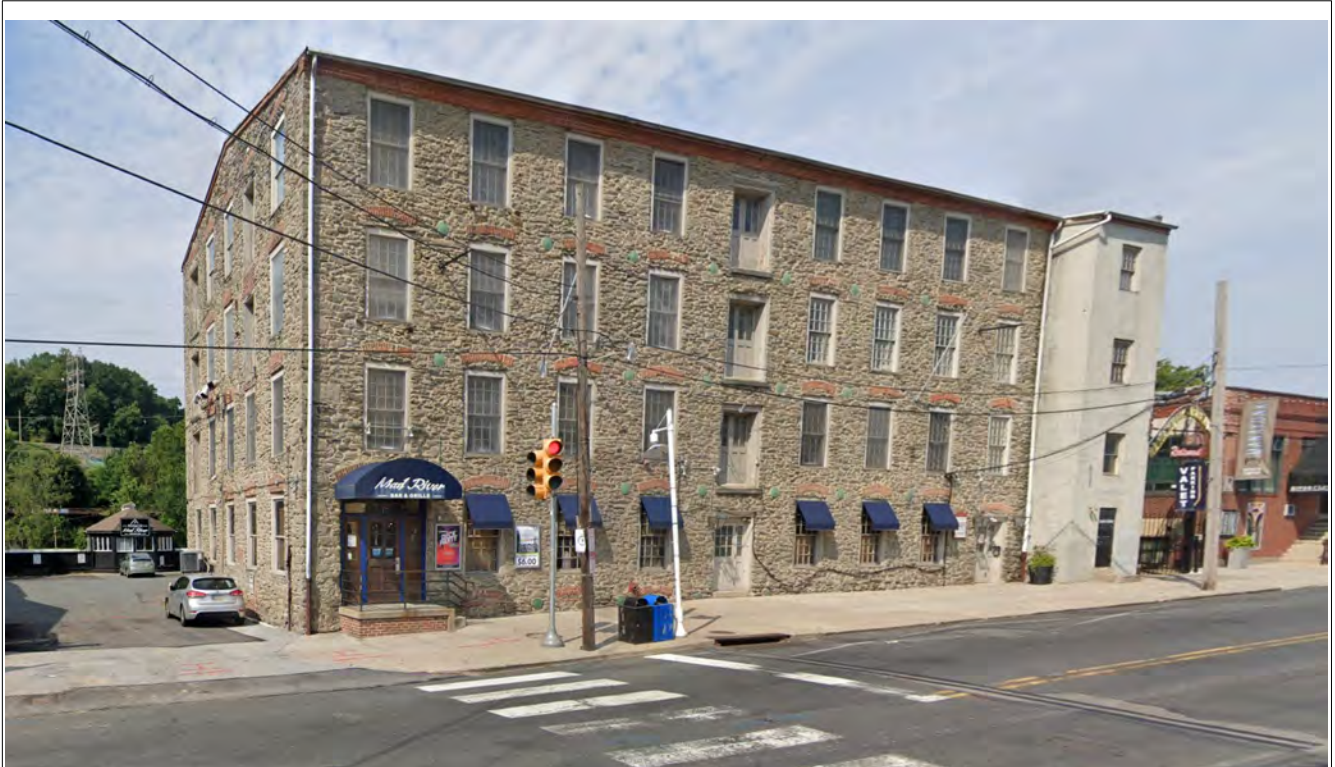


*Illustration 14: Example Main Street Mills 4001 Main, 3901-31 Main Street. A few hundred feet from Littlewood's*



*Illustration 15: Example Main Street Mills 4250 Main. Large 4-story mill building presenting as 3-story on Main Street*





*Illustration 16: Example Main Street Mills 4100 Main*



*Illustration 17: Example Main Street Mills 4313-4317 Main*



## CHP Planning report for the applicant identifying several area buildings to show that the proposed building was not out of scale.

In this summary we refer to the Main Street Historic District. This is sections A and B of the Main Street/Manayunk and Venice Island Historic District. These are the sections that cover Main Street from Leverington Avenue to Ridge and Main.

4501 E. Flat Rock Road. The building is five stories over parking and is not on Main Street and is not in the Main Street Historic District and was not built on a historic site. It is also subject to repeated flooding, property damage. An earlier Philadelphia Flood Plain Manager characterized this as the most property with the most repetitive flood losses in the city. It was built after the community lost a five year battle to prevent residential development in the floodway.

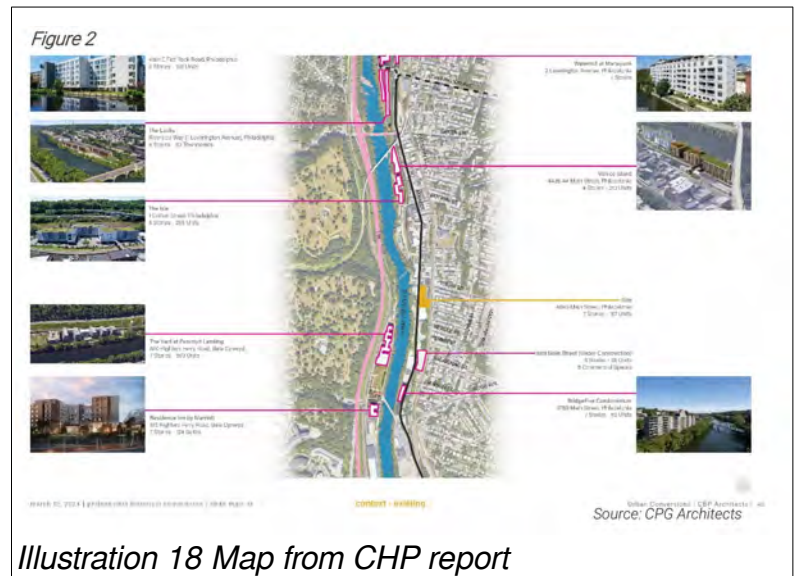


Illustration 18 Map from CHP report

Riverside Way, The Locks. These are five 55' tall condo buildings on Venice Island. They are not in the Main Street Historic District and were not built on a historic site. They are not a single mass. They are not 82' tall. The scale of these buildings is consistent with historic mill buildings.

1 Cotton St. The Isle. It is five stories. It is on Venice Island and not in the Main Street Historic District and was not built on a historic site. It was built by right with plans submitted just before the 2012 zoning code changes that would disallowed it.

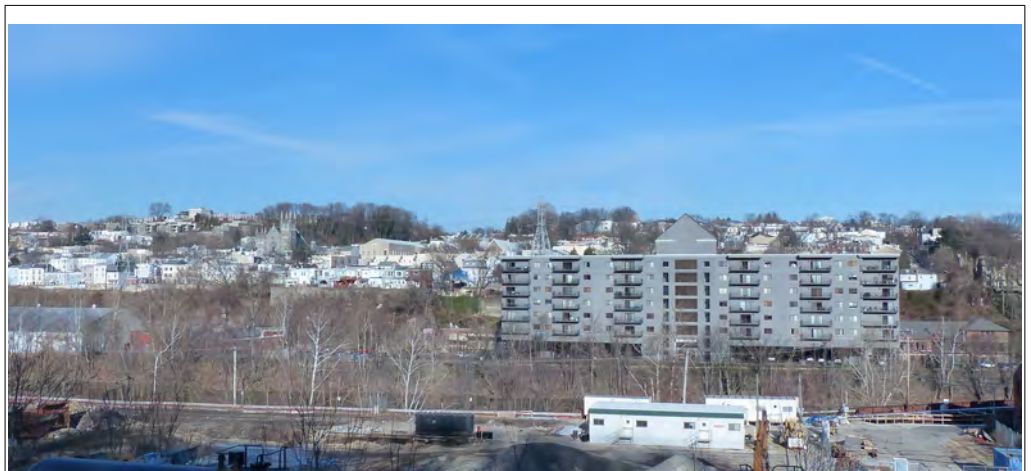
The Yard at Pencoyd Landing. Across the river in Montgomery County. Not in Philadelphia and not in the Main Street Historic District, of course.

2 Leverington, Watermill. Not on Main Street, Not in the Main Street Historic District and not built on a historic site. Mostly hidden behind other buildings and the railroad tracks.

4436-44 Main Street. This project has been proposed as a by right project. It is only four stories. It is not currently under construction. It is primarily on Venice Island, has not filed for building permits and has not filed for Historical Commission review. It is also not in the Main Street Historic District.

3811 Main Street. Six stories but significantly smaller. Exceeds the height limit by only 10'. Commercial mixed use. Supported by the community after significant reductions to the original plans.

3750 Main Street, Bridge Five. This building is somewhat in the same scale. The proposed project is about 20% longer and a few feet higher. Manayunk Neighborhood Council opposed the project. It is a unique sore thumb in the community and can best be described as an abomination.



**Manayunk Neighborhood Council Oral Testimony to the Committee on Financial  
Hardship on April 3, 2024  
Kevin Smith and John Hunter**



- application and require the property owner to present a new plan that preserves more of the historic structures and the integrity of this historic site.
- Kevin Smith, the president of the Manayunk Neighborhood Council, asserted that the application makes several major strawman arguments. It argues that, if reused, the site must be reused as I-2 industrial zoning. It argues that if reused, all existing structures must be kept. And it argues that the buildings are so interconnected, so it is all or nothing. It also tries to establish the false dichotomy that the property must be reused in its current form, or completely demolished and rebuilt as in a purely residential form. If you take those arguments off the board, 90% of what has been presented by the developer falls away. The application spends a great deal of time supporting those strawman arguments. The entire stretch of Main Street from Shur's Lane to the Wissahickon Creek is ICMX and I-1 industrial zoning. The letter by the flood consultant employs several of the strawman arguments and adds one of its own. It focuses on truck traffic, chemical storage, and heavy industrial equipment and adds a strawman argument about dry waterproofing, implying that this would be necessary and desirable for free use. It is simply not relevant. The ground level will flood to some degree with some frequency and once in a while to a high degree regardless of the activity on the site. The applicants argue that temporary lodging would require a variance, but so would the proposed apartment building. The apartment building would also require ADA access. The application also simply asserts, without documentation, that emergency egress would require an annex, and such an annex would compromise the redevelopment potential of the adjacent lot. The applicants suggest using the building as temporary lodging facility, but transient residents and visitors to this area may not be familiar with the flood response, procedure, and evacuation routes. He stated that a fire is worse than a flood. As fast as the water rose during Ida, the time to react to the flood was measured in hours, not in minutes, as it would be with a fire. The architect points out insurmountable problems of reuse like the lack of sufficient egress and claims that the possibility for viable at egress to the public right-of-away in the event of an emergency is limited to the Main Street edge of the building. The site has easy access to Shur's Lane above the 100-year flood level and egress to Shur's Lane will have to be created. It is a complete strawman argument. The architects point out environmental hazards such as lead paint asbestos. They will need to be abated with any redevelopment. He mentioned mold and radon. He claimed that these are common conditions, not insurmountable problems. He objected to the letter from Nancy L. Temple and asserted that her opinions are offered without evidence or argumentation. He rejected the claim that the new development will bring in residents who can frequent local businesses, providing an economic boost for the neighborhood. Every residential project proposed for Manayunk in the last 25 years has made this claim, yet Main Street struggles with dead afternoons and hard-to-fill shops. The applicants also argue that this development will provide sustainable growth through its adaptive use of an existing vacant structure, but it is not proposing any sort of adaptive reuse; it is proposing complete demolition and the construction of a seven-story apartment block. Mr. Smith contended that the entire Econsult Solutions report is filled with strawman arguments. He objected to the report's conclusion that there is no reuse for the existing buildings. He asked why it did not include a discussion of the available parking across the street. He stated that the site could be developed for mixed use. He asked how much the property costs to acquire. He suggested a less ambitious project based on realistic property values. He stated that, if it is impossible and impractical to put any sort of commercial use on the site because of frequent flooding, then packing the site full of people and cars is not the best solution. He

asserted that the building complex is not a house of cards. The application does not include any engineering evidence that these buildings are unstable or codependent. He asked the Committee to recommend denial of the application.

- Jay Farrell stated that he has a general sense that hardship applications have become too frequent of late, and that the bar for granting them seems to be set a lot lower than it should be, particularly when industrial buildings are involved. He noted that he agrees with Paul Steinke about selective demolition to accommodate new uses. He observed that this complex is a significant mill in Philadelphia's first historic district. He said that the developer needs to look harder and imagine reuses for these mostly intact buildings and not give in so easily to the supposed hardships. He said that he does not take much stock in the financial outlook for any reuses because the analyses are "kind of fuzzy." He suggested that the developer try harder to find a reuse.
- John Hunter, an architect and the zoning chair of the Manayunk Neighborhood Council, stated that he has been involved in discussions with the developer regarding this site for over the last couple of months. He suggested breaking up the financial analysis into separate analyses for different structures because some areas could be selectively demolished. He objected to the blanket approach, the all-or-nothing approach. He stated that the applicant's analysis relies on a superficial assessment of the importance of each of the individual structures, and its feasibility for reuse.

#### **ADDITIONAL DISCUSSION:**

- Mr. Laver stated that the entire application team has great respect for everyone who spoke and noted that, in good faith and in the spirit of open discourse, he and his client have engaged with the Manayunk Neighborhood Council over the course of several months and toured the site with members of the Council. He stated that his team looks forward to continued discussions and expects that there may be some differences of opinion along the way. He stated that his team has explored all alternatives and made the unfortunate determination that there is no viable reuse, which is based on the independent opinions of the experts. The structures are in the floodplain, but even if they were not in the floodplain, they would face significant challenges to redevelopment. Mr. Laver stated that they explored floodproofing, but it is not viable, owing to the flood depths at the site.
- Mr. Leighton introduced himself as the architect on the team. He stated that cbp Architects has a depth of experience working with the adaptive reuse of historic structures, especially former industrial buildings. He stated that his firm worked with the developer of this project, Urban Conversions, on the project that was mentioned earlier in the meeting that is receiving the award from the Preservation Alliance. He stated that his firm has adapted historic buildings for housing, a fire station, condominiums, rental apartments, live work, lofts, artist studios, and galleries. He stated that this is not the first complex of buildings like this that he has worked on, an agglomeration of structures built over a period of years and decades. In similar cases, his firm has approached the complexes with the idea of undertaking some selective demolition to reveal the bits and pieces that seem to have the greatest possibility for reuse. However, this complex of interconnected buildings has posed challenges that have not been encountered elsewhere. For example, there are rock outcroppings along the rear of the site that support the roofs of some buildings and form a retaining wall for the parking lot on the adjacent property. The railroad viaduct that runs just to the north of this property poses challenges such as forming a large



**Manayunk Neighborhood Council Written Testimony to the Committee on Financial  
Hardship on April 3, 2024**

**Our written testimony was not prepared in time for inclusion before the hearing but it  
was emailed in at the last minute and we provided verbal testimony at the hearing.  
The email testimony was included in the public record.**

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

Kevin Smith <kevin.smith@manayuncouncil.org>

Wed 4/3/2024 8:25 AM

To: preservation <preservation@Phila.gov>

Cc: Hanna Stark <hstark@preservationalliance.com>; John Hunter <johnhunter286@gmail.com>

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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 its 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 its 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 12 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.

--

Kevin Smith, President, Manayunk Neighborhood Council.

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Philadelphia Historical Commission  
1515 Arch Street  
Philadelphia, PA 19102

April 22, 2024  
Re: 4045-61 Main St.

Dear members of the Historical Commission,

I am writing to you on behalf of the Wissahickon Neighbors Civic Association(WNCA) to provide our statement in regards to the demolition and building proposal at 4045-61 Main St. Manayunk.

In regards to the demolition, without having gained access to the property, we don't have a sense of the condition and viability of the buildings, therefore we don't feel qualified to discuss whether or not we believe it is possible to preserve in totality. We do however believe it is important for everything to be done to explore all avenues to preserve as much as possible, respecting and upholding it's designation on the National Register of Historic Places. We would especially like to see extra consideration go into the preservation and repurposing of the old hotel on the property. We also acknowledge concerns around flooding in that area.

In regards to the building proposal, we do not approve of a seven story building being build on Main Street, and would like to see more effort go into respecting the characteristics of Main St., and Manayunk, especially respecting building height restrictions.

In a recent public meeting, concerns came up about the impact of traffic in that part of Manayunk with such a large residential building there. Folks are also concerned about residual chemicals from the dye mill and how a total demolition might have an effect on the surrounding environment.

Sincerely,  
Stacey Holder  
WNCA Zoning Chair





# PRESERVATION ALLIANCE

*for greater philadelphia*

April 19, 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 denial of the proposed new construction. This letter supplements our earlier comments on the demolition application and will now focus on the proposed new construction.

As the property sits in the center of Manayunk's industrial history, this prominent site is critical to maintaining the character of the Manayunk Main Street Historic District. The proposed 7-story building, towering over the district and surpassing the size of existing mill buildings, is deeply out of scale. The Main Street façade would be more contextual if the floors over 3 stories had a generous setback. The large, block-like massing, currently proposed, is also incompatible and should be varied and broken up. The interior of the 4100 block, from 4113-35 Main Street, showcases how breaking up massing, setbacks, and retention of facades can be successfully implemented.

While the proposal incorporates portions of the facades along Main Street into the new construction, these elements currently appear as mere wallpaper, not integral parts of the design. To truly honor the district's historic fabric, the retained sections should play a prominent role in informing the design, with setbacks and façade variations corresponding to existing structures. We believe that retaining more of the existing structures, including the former Fountain Hotel (offices since the late 1880s), 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 and deny the out-of-scale and non-contextual new construction. The integrity of the Main Street Manayunk Historic District should be upheld and homage paid to Manayunk's industrial past.

Sincerely,

Paul Steinke, Executive Director



# 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>

Cc: Hanna Stark <hstark@preservationalliance.com>; John Hunter <johnhunter286@gmail.com>

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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 its 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 its own. They focus on truck traffic, chemical storage and "heavy industrial equipment" and throw in their own straw man argument about dry waterproofing which 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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