



United States Department of the Interior



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

IN REPLY REFER TO:

1.A.2

March 6, 2018

Ian Litwin
Philadelphia City Planning Commission
One Parkway, 13th Floor
1515 Arch Street
Philadelphia, PA 19102

Electronically transmitted with hard copy to follow

Dear Mr. Litwin:

Independence National Historical Park [INDE] and Society Hill Civic Association [SHCA] share a long, distinguished heritage. The park, a federal national historic district and Society Hill Historic District [SHHD], listed on the National Register of Historic Places [NRHP] in 1971 and on Philadelphia's Register of Historic Places in 1999, both grew during Philadelphia's era of post-war redevelopment. The park includes Independence Hall, a World Heritage Site and encompasses resources such as Congress Hall, Old City Hall, the Dolley Todd House, Bishop White House and the City Tavern, as well as five National Historic Landmarks [NHLs]. Combined, the two districts are home to fourteen individually listed NHLs. The cooperative association of both entities over the past seven decades has produced two thriving successes in neighborhood revitalization and historic preservation. Today, portions of INDE and also the Thaddeus Kosciuszko National Memorial, which we own and manage, are located well within SHHD. Because the two national historic districts are so entwined, I am writing to comment on the "Society Hill Neighborhood Plan" produced by KSK Architects, Viridian Landscape Studio and Urban Partners (November 30, 2017).

The outcomes of this plan will directly impact federal property. Specifically:

- **Issues and Concerns.** Of the 38 Society Hill sites with issues and concerns identified on the map on page 10, eleven properties abut INDE property and three more are within our viewshed.
 - Positano Restaurant (200 Walnut Street) is directly across from City Tavern and within the view shed of Robert Venturi's Welcome Park on Second Street.
 - The Ritz 5 Cinema (214 Walnut Street), consolidated with the Nelson Building (222-30 Walnut Street) is directly across from the Merchants' Exchange Building, an NHL. The 200 and 214 Walnut Street properties frame the continuation of the cobblestoned Dock Street, a recreation of an historic streetscape, which passes from the front of the First Bank of the United States, an NHL around the Merchants Exchange and behind the City Tavern Garden and into SHHD, making a seamless connection and intentional reference to the significant history of the

area and Dock Street. Changes to the height of the properties across from the Merchants' Exchange and flanking Dock Street would be a concern.

- Since 2005, INDE has held an easement for the management of Washington Square. As such, we are very interested in the concerns identified in the SHHD plan about the vulnerability of properties surrounding Washington Square to incompatible development. Two of these, the Athenaeum at 219 S. Sixth Street and the Reynolds-Morris House, one block west of the square at 225 S. Eighth Street are NHLs.
- St. Mary's School (440 Locust Street) abuts INDE's Magnolia Garden and sits at the end of a row of park properties (230-232 Leithgow Street; 413-415 Locust Street; 421- 423 Locust Street; 408-410 Locust Street) which the park rehabilitated and restored to their historic appearance during the late eighteenth and early nineteenth centuries. Additional development on the school's property could adversely impact the appearance of this historic street and also put in shade the treasured Magnolia Garden, created in 1959 by the Garden Club of America and part of INDE.
- St. Mary's Convent (233-247 South Fifth Street), now subsidized senior housing, abuts INDE's properties that include the Rose Garden which stretches from Walnut to Locust Street and was dedicated by the Daughters of the American Revolution in 1971. The introduction of a larger building on the convent site could adversely impact the plantings in this designed landscape as well as adversely affect the entire historic 400 block of Locust Street. Large-scale development of that site also has the potential to adversely affect the Philadelphia Contributionship, an NHL, abutting the east boundary of the Rose Garden, at 212 S. Fourth Street.
- **Zoning.** The plan proposes rezoning parcels that are currently incorrectly zoned and as such carry the potential for inappropriate redevelopment that would increase density and otherwise adversely impact the character of the area.
 - We support this recommendation in particular for several structures surrounding Washington Square. Specifically, we support the proposed zoning changes for 219-21 S. 6th Street (the Athenaeum); 223-225 S. 6th Street (Dilworth House); 227-231 S. 6th Street (Lippincott Building); 233-241 S. 6th Street (Independence Place); 600-602 S. Washington Square (Lea and Febinger Publishing House); 224-228 W. Washington Square (three-story rowhouse buildings); 210-216 W. Washington Square (Ayer Condominium); and 230 W. Washington Square (Farm Journal Building).
 - We support the plan's recommendation to rezone 233-247 S. 5th Street (former St. Mary's Convent) and also 211-25 S. 4th Street (Willings at Independence Park Condominium) which abuts INDE's garden at Fourth and Walnut Streets next to St. Joseph's Church. This garden area is part of INDE's overall landscape design which includes gardens next to select historic churches as buffers against fire and development .and to enhance views of the historic buildings.
 - We also agree with correctly zoning the aforementioned Philadelphia Contributionship building and its associated parking lot at 208-24 South Fourth Street. These properties and the St. Mary's School and Convent properties bookend our properties between Fourth and Fifth Streets. Inappropriate zoning and consequent redevelopment would adversely affect the historic scene that the National Park Service has so carefully recreated.

- **Proposed Zoning Code Regulation Changes.** We endorse the recommendation to establish a special area, Zone 3 that would include the north and south sides of Walnut Street from and including Front to Fourth Streets. This would limit height and require Planning Commission approval for all new construction and/or alterations. INDE owns all of the property on the north side of Walnut Street from Second to Fourth Streets in the proposed zone. We have an interest in strengthening the existing Independence Hall Area overlay district in order to maintain an appropriate context for our historic structures (see above), reconstructed row and garden; and five NHLs, the Merchants' Exchange Building, the First Bank of the United States, Carpenters' Hall, the Second Bank of the United States and the American Philosophical Society's Philosophical Hall. In addition, the Bishop White House, the Todd House and the reconstructed City Tavern are located within this area.

- **Recommended Design Standards and Guidelines for New Construction.** We believe this section offers clear, strong guidance intended to supplement the Secretary of Interior's Standards and Guidelines for Archeology and Historic Preservation. These two standards are compatible as the SOI's standards are intended for general use and the SHHD's standards carry details specific to the zones in the district.
 - We agree with the plan's suggestion that approvals for new construction and alterations should move through the City's approval process in a logical sequence. There must be transparency among the different City departments and approvals should reflect a zoning review.
 - In order to protect park properties which include a World Heritage Site and five NHLs, we strongly support the proposed Zone 3 guidelines that prohibit height bonuses within the zone.
 - Finally, as noted above, the two districts comprise a total of fourteen NHLs. To be designated an NHL or listed in the NRHP, a property or district must have integrity. Integrity is the ability of a property to convey its historical associations or attributes. The NHL and NR programs recognize seven aspects or qualities that, in various combinations, define integrity. They are: location, design, setting, materials, workmanship, feeling and association. To retain historic integrity, a property will always possess several, and usually most, of these aspects.
 - NPS does not have legal authority to disapprove or approve projects regarding subdivisions or construction which do not involve federal undertakings. Land use law in the United States is strongest at the local level. Local governments control planning, zoning, historic preservation ordinances and the building permit process. Since designation as an NHL and listing in the NRHP by the federal government does not automatically invoke local historic district zoning or local landmark designation, we strongly support efforts by communities to work with local governmental authorities to ensure that NHLs and NRHP properties have the highest level of protection that local preservation law permits, and that local planning, zoning and historic preservation requirements are met. We find that design guidelines are an excellent tool for ensuring that most development is sensitive to the overall character and feeling of a district and is compatible in materials, design, workmanship and association.

Independence National Historical Park and Society Hill Historic District are internationally regarded as models of successful urban redevelopment. In their present form, these districts represent years of careful study, cooperation and commitment by generations of residents and park managers. We commend Society Hill Civic Association for undertaking this plan as a way of perpetuating the vision of preceding preservationists. Just as INDE's and Society Hill Civic Association's inception and growth have been joined, so will be our futures.

Thank you for considering this letter of support. If you have questions or comments, please contact me at Cynthia_MacLeod@nps.gov or 215-597-7120.

Sincerely,



Cynthia MacLeod
Superintendent

Cc: Roseanne Loesch, President, Society Hill Civic Association