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

www.ManayunkCouncil.org

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Mark Turtle, Treasurer Joy Griffin, Trustee Sandy Sorlien, Trustee David West, Trustee

> July 21, 2005 **OPPOSED**

Board of Building Standards Municipal Services Building 1401 JFK Blvd. Philadelphia, PA 19102

Re: 3 Rector Street--OPPOSED

Dear Sirs,

3 Rector street is zoned industrial. Others have argued that the site is unsuitable for industrial reuse. No one has argued that industrial re-use is mandatory, preferred, or even desirable. Manayunk Neighborhood Council is not arguing for or against industrial re-use.

Others have argued that the site is unsuitable for retail or restaurant use due to increased traffic and possible nuisance behavior. This is a commercial district built on retail and restaurants. Many restaurants exist on Main Street without troubling the neighbors. Casting retail use on Main Street as undesirable is not a defensible position.

Manayunk Neighborhood Council supports industrial, retail, restaurant, residential, or other office or commercial re-use of the property. This is, of course, not unconditional. We are often threatened with undesirable uses such as rendering plants, and night clubs. Experience tells us these are empty threats. Canal House Apartments is an example of adaptive re-use of existing buildings along Main Street. We are confident that an appropriate re-use can be found for this beautiful building.

The building across the street, 2 Rector Street, has had three businesses in the last 10 years (and perhaps longer). A rug store, Smith & Hawken, and Bourbon Blue. The rug store operated five or more years. Smith and Hawken operated two years. Smith & Hawken also opened three stores within 10 miles of Main Street (See Figure 1). It can be argued that they undercut their own business. The only other rug store on Main Street, Rug Maven, is currently closing. Bourbon Blue is doing well. The retail history of 2 Rector Street only demonstrates normal turnover in any retail district or shopping center.

It has been argued that this proposed residential development is essential to the commercial revitalization of Main Street. Main Street is already revitalized. Manayunk Development Corporation's web page lists over 100 businesses in the district. The street is fully developed, with a few exceptions, along the 1/2 mile between Green Lane and Shurs Lane. Rector street falls, roughly, in the middle of this district.

It has been argued that the failure to sell the building, over the last three years, proves the existing building is unusable. We believe that Harry Renner, former owner of Manayunk Brewing Company, offered over \$600,000 for the property. Mr. Labov, in his testimony at the Historical Commission, indicated an offer for \$800,000 was withdrawn at the last moment. We believe that this indicates a clear value to the property, as it is. There is no hardship.

17 residential units provides no compelling reason to tear down a contributing historic structure. About 120 residential units have recently been built on Main Street. Another 128 are currently being built, 270 more are approved within 100 yards of this site and 200 more are planned. Just up the hill, 70 units, and over 250 homes are under construction on nearby Umbria Street (See Figure 2).

The existing building is compatible in both size and style to Bourbon Blue (2 Rector) across the street (See Image 3). The proposed building is industrial in nature but not historic in any way. While not out of scale with some buildings on Main Street, it's size and style are not appropriate for this location. That aside, the developers have not made any attempt to enhance or expand on the existing structure to accommodate their plans. They have offered only to tear it down and replace it with trendy loft style condos.

Manayunk Development Corporation has recently completed a multi-million dollar canal bank restoration project. Canal restoration is not complete and additional work is still required. The long term goal is to restore water flow to the canal and open it up to recreational use. To guide businesses in developing access to the canal and tow path, Manayunk Development Corporation has recently completed a Tow Path Master Plan. The Plan sets guidelines for development along the tow path with the express goal of connecting the tow path to the Main Street businesses. A master plan is currently being developed for lower Venice Island (Cotton Street to the tip). A key part of this plan is to connect the river to the canal, tow path, and Main Street.

3 Rector Street, along with Bourbon Blue (2 Rector Street) has, arguably, the best access to the tow path and canal of any Main Street locations (See Image 4). The plans for 3 Rector Street call for using the lower level as parking. This is a worst possible use for this valuable resource. A parking garage, however well disguised, will degrade the experience of everyone using the tow path. Floodplain regulations do not allow underground parking. A lower level parking lot must be open on the canal side, limiting the degree to which it can be hidden. Allowing this project to go forward undermines the years of effort and millions of dollars already invested in the tow path and canal.

The lower level of this building is in the 100 year floodplain. Ground level is approximately in the 10-15 year floodplain. The destruction of this historic structure should not be allowed without a full analysis of the floodplain regulations as they would apply to new construction on this site.

We ask that the board reject this proposal. There is no appreciable gain to Main Street or to Philadelphia for the trivial additional residential units. There is significant loss of historical character. There is a loss of retail, restaurant, or commercial opportunities in a commercial district. There will be a significant loss to the Tow Path and Canal experience which are key parts of Main Street's future.

Thank you, Kevin Smith President

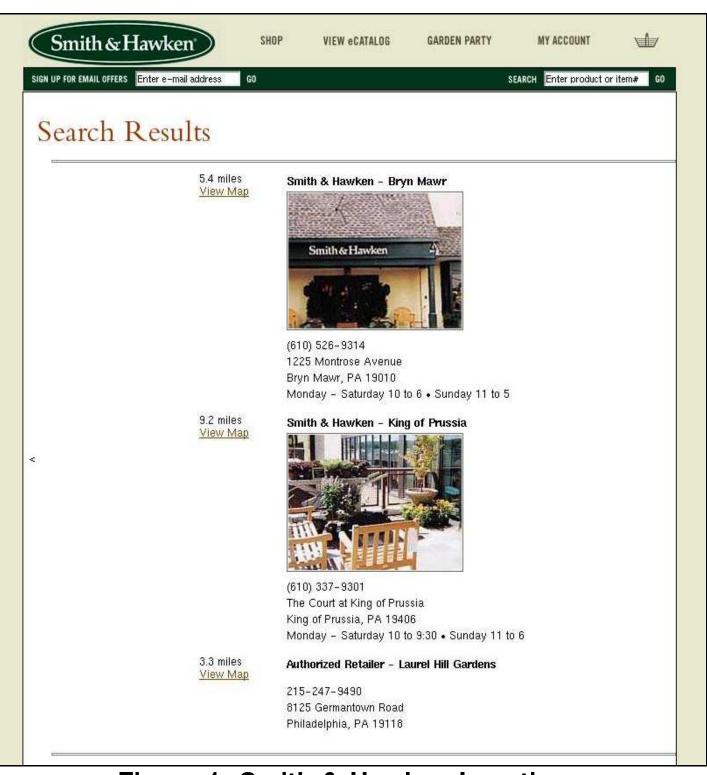


Figure 1--Smith & Hawken Locations

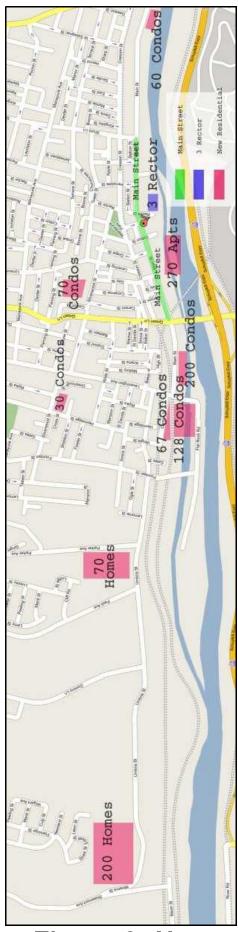


Figure 2--New Residential



Figure 3--Bourbon Blue and 3 Rector

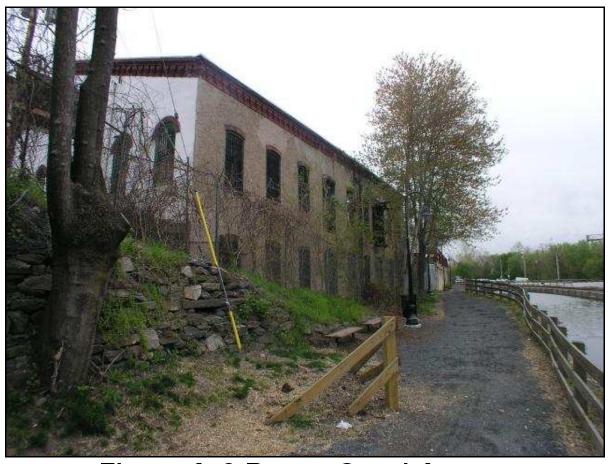


Figure 4--3 Rector Canal Access