

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

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Philadelphia Historical Commission  
1515 Arch Street  
Philadelphia, PA 19102

May 10, 2024  
**Re: 4045-61 Main Street  
Argument for Denial**

Dear Members of the Historical Commission

**For all the reasons we will give below we ask that the commission support the conclusion of the Architectural Committee and deny both the demolition of the current historic site and the construction of the proposed apartment block.**

It is manifestly clear that the applicant has no interest or incentive, so far, for historic preservation in Manayunk. To that end they have assembled an array of reports designed to, of course, support that position. We are critical of the proposal to wipe away 175 years of history (something Nature has so far failed to do). We are critical of the proposal to put a seven-story apartment building larger than a football field in it's place.

We are also critical of the series of reports that single-mindedly misrepresent site conditions and economic conditions with a series of strawman arguments and false dichotomies. We go into detail in our testimony to the Hardship Committee and the Architectural Committee.

## **Historic Preservation**

This site presents several significant opportunities for preservation of significant buildings or portions of buildings.

FEMA publication FEMA P-467-2; National Flood Insurance Program; Floodplain Management Bulletin; Historic Structures, lays out requirements for preservation of historic structures in the floodplain.

This publication would seem to grant a fairly open framework for preservation contrary to the application's reports that all assert that all structures have no useful space above the flood level and nothing is worth saving.

### **FEMA P-467-2 Floodplain Management Requirements that Provide Relief for Historic Structures**

The NFIP floodplain management requirements contain two provisions that are intended to provide relief for "historic structures" located in Special Flood Hazard Areas:

(1) The definition of "substantial improvement" at 44 CFR 59.1 includes the following exclusion for historic structures,

"Any alteration of a "historic structure", provided that the alteration will not preclude the structure's continued designation as an "historic structure". The same exemption also applies to "historic structures" that have been "substantially damaged".

This provision exempts historic structures from the substantial improvement and substantial damage requirements of the NFIP.

(2) The other provision of the NFIP floodplain management regulations that provides relief for

"historic structures" is the variance criteria at 44 CFR 60.6(a). This provision states: "Variances may be issued for the repair or rehabilitation of historic

structures upon a determination that the proposed repair or rehabilitation will not preclude the structure's continued designation as a historic structure and the variance is the minimum necessary to preserve the historic character and design of the structure."

Under the variance criteria, communities can place conditions to make the building more flood resistant and minimize flood damages, but such conditions should not affect the historic character and design of the building.

The current application contains no evaluation of the many structures that make up this historical site. It's no comfort that the Hardship Committee belatedly recommended documentation of the structures before they were demolished.

**Before there can be any consideration demolition, or a development plan, we believe the site and all it's structures should be fully evaluated with respect to their potential preservation based on all applicable standards.**

Please see the section **Littlewood's Preservation Opportunity** later in this document.

## **Economics and Design**

We have shown, in our previous testimony to the Hardship Committee and the Architectural Committee that the proposal is profoundly inappropriate in design and scale in the Manayunk Historic District. See the section **Manayunk Historic District Scale and Design** later in this document.

In this application to the Historical Commission the applicant has included new material to support their economic argument in the form of a Memorandum from Econsult Solutions, Inc. (ESI) on pages 95 to 99 of the PDF submission.

### **Pages 96-97, The Economics of Development:**

Excluded from this simplistic explanation, is the speculative nature of Urban Conversions' proposal. They have only an agreement of sale. If they can gain approval for a seven-story residential building on Main Street, by variance from the ZBA, and approval from the Historical Commission, they will have produced a proposal of enormous economic potential which they can leverage immediately. If they build such a building, the rental income services not only the load but also a property they can further leverage as their loan burden is reduced. and it adds to their asset portfolio in the long term.

Net Operating Income (NOI) is a simplistic sideshow to their realizing an enormously valuable asset by making claims at the stage of design which requires only that they make many vague commitments which may or may not be realized.

### **Page 97, Concrete Podium:**

ESI Appears to argue that five over two floors of concrete to wood construction is a hardship created by onerous parking requirements. The opposite is true, as described in this 2017 article in Structural magazine (<https://www.structuremag.org/?p=10934>) which notes "Podium designs are one way to maximize the number of stories, increase unit density, and lower construction costs."

Five over two floors of concrete to wood construction is the most efficient structure working within IBC codes. If this building did not sit within the flood plain, the pressure from community/PCPC would be to build to CMX2.5 constraints - with 30' minimum depth commercial space all along Main St. and 1:1 parking. Flooding has precluded this costly requirement and indirectly benefited them enormously in this present proposal.

To eliminate the 2nd floor parking, they can eliminate the upper floors of the proposal and thus avoid the need for that parking component. If they attempted to build 2nd floor rear facing units they would be dark, dreadfully compromised units facing the emergency egress and the adjacent ICMX property.

We are, of course, happy to discuss parking ratios once a development, with historical preservation and appropriate scale and design is presented.

**Page 97, Storm Sewer:**

That a storm sewer comes with the site is a normal site specific condition. It's presence should have been factored into the asking price of the property.

**Page 98-99: Design Inefficiencies:**

The 2nd floor is raised, primarily, to facilitate meeting the existing sidewalk elevation in the NW corner of the site for evacuation purposes. The fitness center and co-working spaces could be at different elevation, accessed by ramps in corridor spaces. The need for second floor parking is driven by their number of units and could easily be remedied. The reference to relocating units is spurious and misleading as we described above in the concrete podium comments.

The location of the main lobby and the extra core argument is spurious and unrelated to the proposed facade wallpaper. The cores are located at the 'dead' inside corners of the u-shaped upper floors which are determined by the shape of the site. Minimizing corridors and accessing amenity spaces is a marketing benefit.

**Page 99, Other Considerations:**

Is an embarrassing list of desperate complaints citing factors common to almost any project. They left out cost of materials and cost of labor.

In the end we don't believe the Memorandum nor the other reports say anything in particular beyond that the property floods and preservation can cost more than clean slate building. They pointedly ignore the possibilities of more modest mixed re-use combining commercial, residential and historical preservation.

**For all these reasons we ask that the commission support the conclusion of the Architectural Committee and deny both the demolition of the current historic site and the construction of the proposed apartment block.**

Should the applicant eventually produce a project meeting Historical Commission standards we also ask that demolition only be approved after uncontested zoning and building permits are obtained.

Thank you



Kevin Smith  
President, Manayunk Neighborhood Council

# Littlewood's Preservation Opportunity



Illustration 1: Aerial View

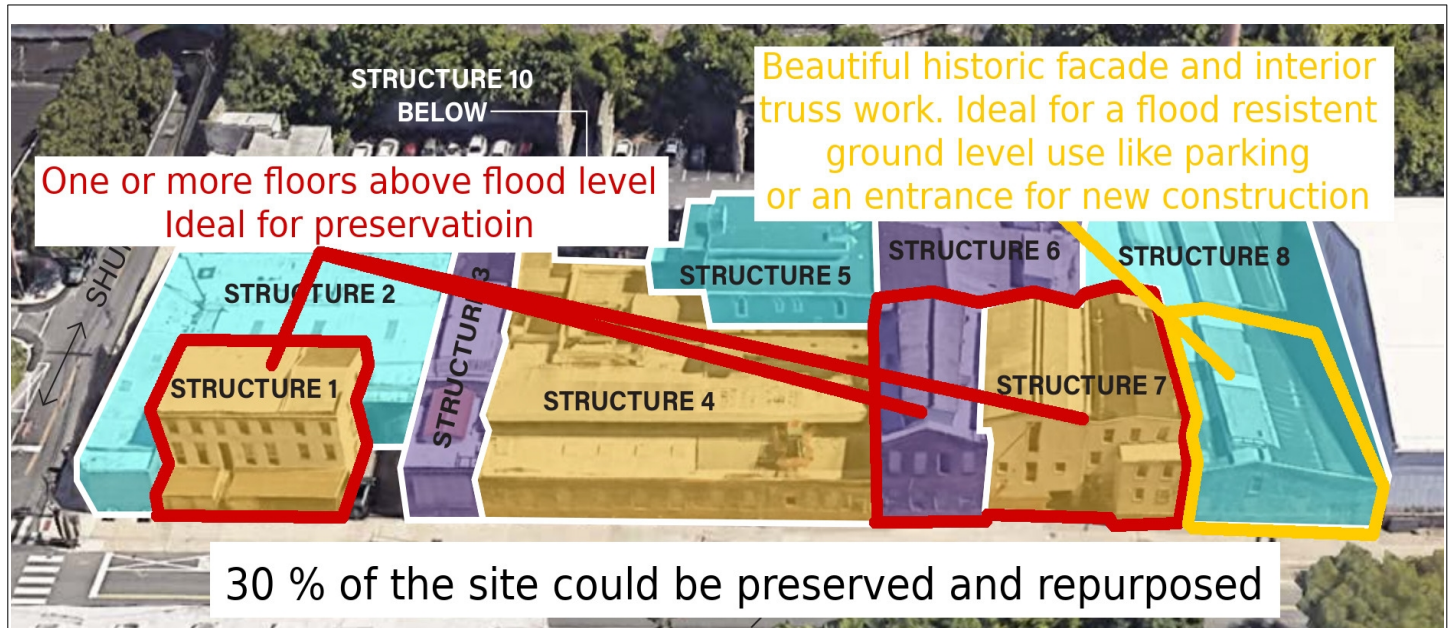
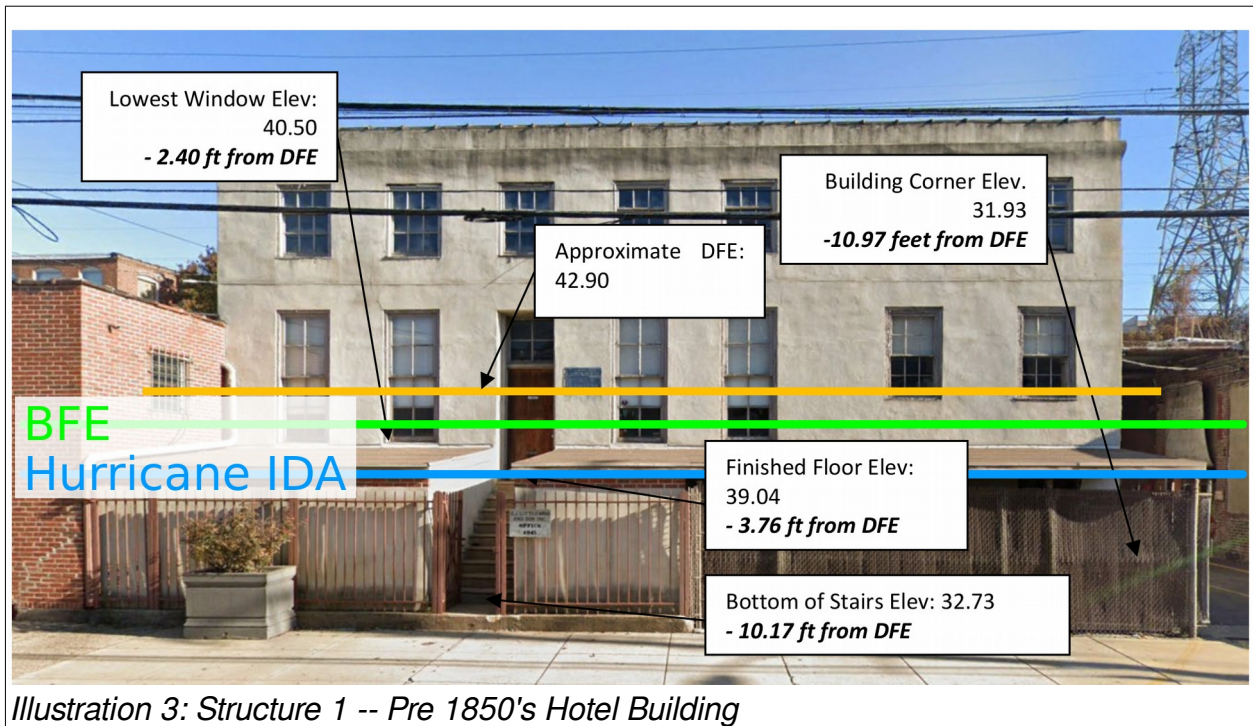


Illustration 2: Preservation Opportunities



## Historic Pre-1850 Hotel Building



While Hurricane Ida, in 2021 was the highest flood since 1869, it still only managed to touch main floor. This building presents many preservation opportunities high ceilings (See Illustration 4 below). Even then the peak flood level was well below the predicted 100 year BFE.

The finished floor height to the roof joists is almost 15' (estimated). If the floor were raised to BFE there would still be 12' to the roof joists. Even at DFE there would be over 10' ceilings.

The annex (right hand 1/3 of the building already has floors at the BFE level (we have been in the room behind the two lower windows on the right).

Federal guidelines also allow for the complete elevation of the building.



*Illustration 4: Pre 1850's hotel main floor*



## Historic Structures with floors above the flood plane



*Illustration 6: Historic Hotel with 12-15' usable space above the flood plain*



*Illustration 5: Historic Mill Buildings with floors above the flood plane. Structure 8 on the right is not above the flood plain but has a beautiful historic facade and interior truss work. Ideal for a flood resistant ground level use like parking or an entrance for new construction.*





*Illustration 7: Structure 6 upper floor well above any flood level*

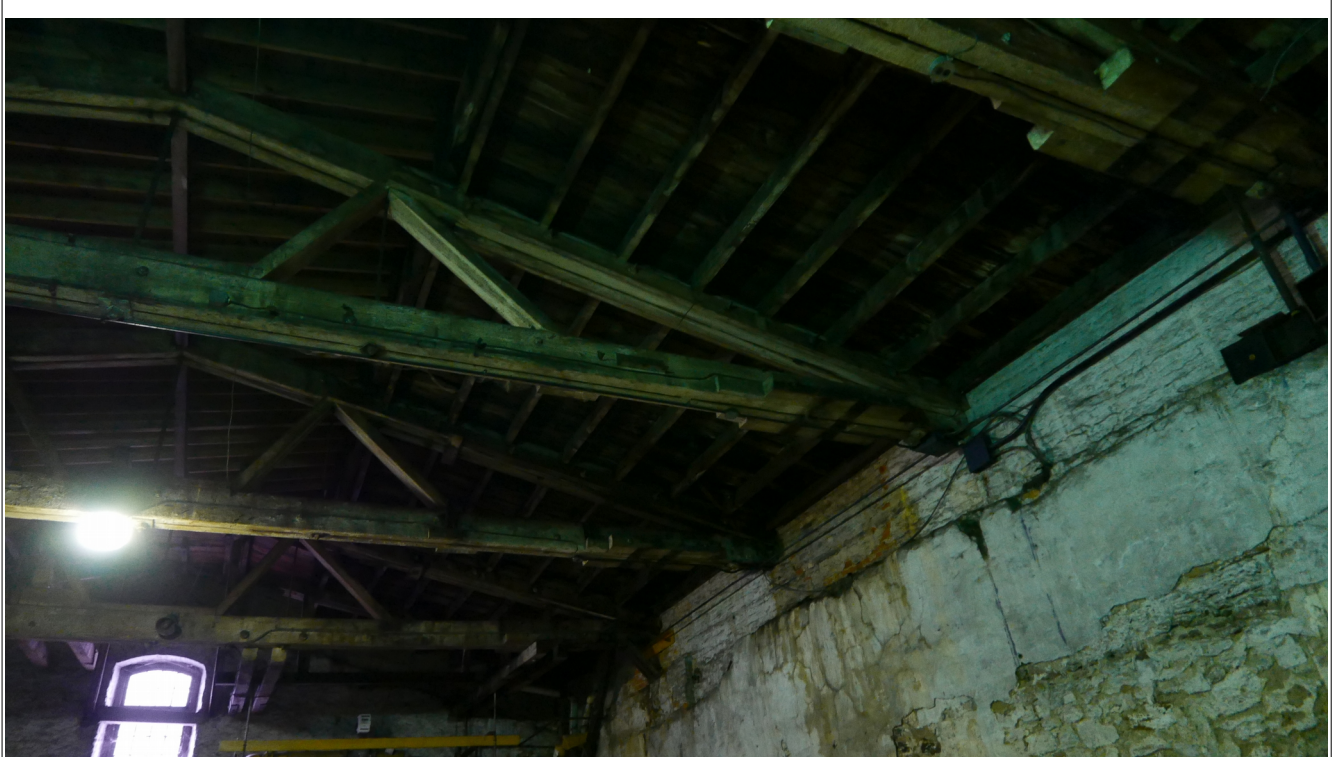


*Illustration 8: Structure 7 second floor. Also a third floor above*





*Illustration 9: Structure 8 Roof and Trusses*



*Illustration 10: Structure 8 Roof and Trusses*





*Illustration 11: 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 12: Pre-1850 Historic Hotel Building 2nd Floor Office with 10' Ceilings*

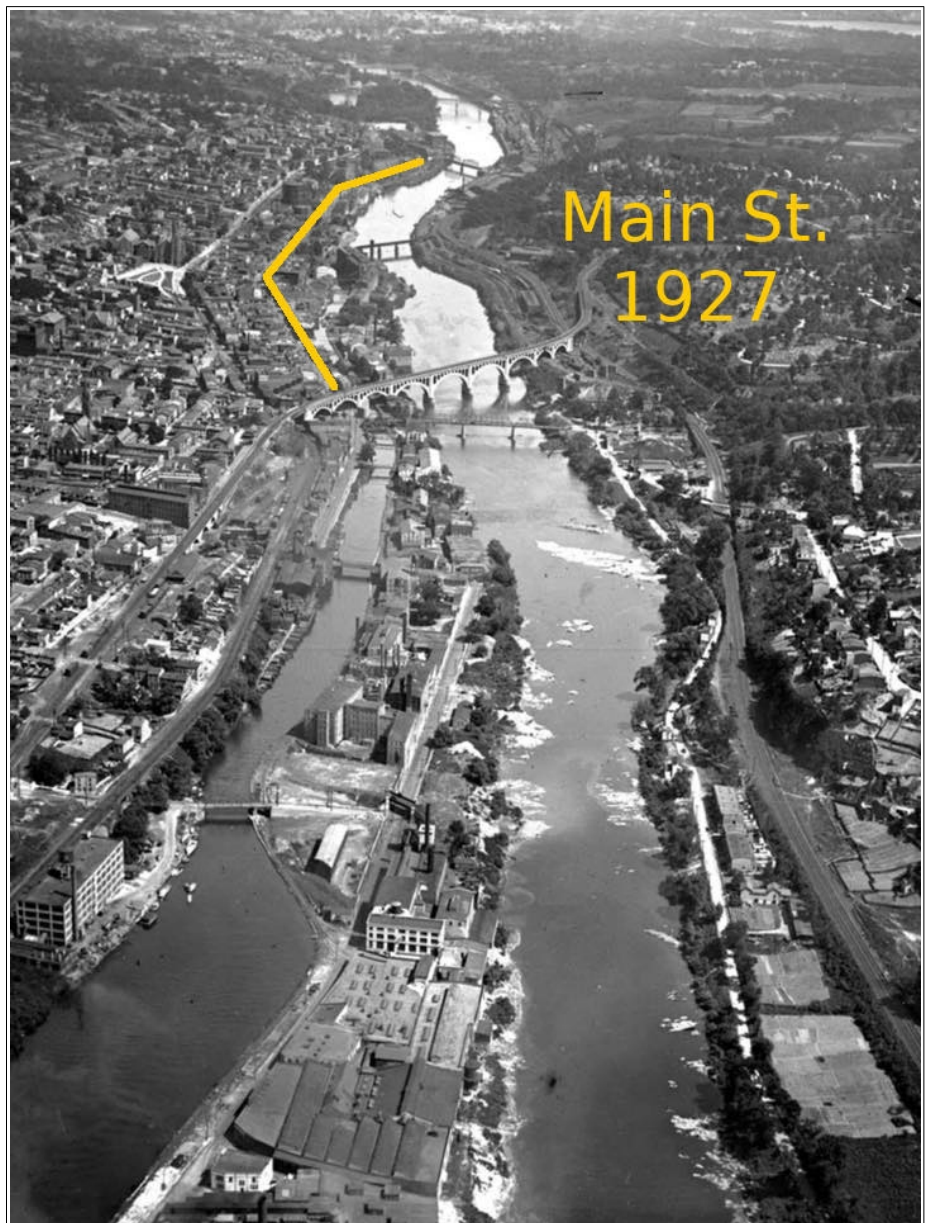
# Manayunk Historic District Scale and Design

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



*Illustration 14: Example Main Street Mills 4250 Main. Large 4-story mill building presenting as 3-story on Main Street*





*Illustration 15: Example Main Street Mills 4100 Main*



*Illustration 16: Example Main Street Mills 4313-4317 Main*