

February 18, 2025

Via E-mail

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission
1515 Arch Street, 13th floor
Philadelphia, PA 19105

Re: 1520 Chestnut Street Nomination

Dear Dr. Farnham,

We represent PR Chestnut Associates LP, the owner of the property at 1520 Chestnut Street (the “Property Owner” or “Owner”). As you know, the building located at 1520 Chestnut Street (the Property”), known as the former S.S. Kresge Store (the “Building”), was nominated in 2022 for historic designation by the Center City Residents Association under Criteria for Designation C, D, and E.

In sum, the Property Owner does not oppose the Commission’s designation of the Building’s Chestnut Street and Sansom Street facades, provided, however, that the designation is limited to the Property’s facades only and that such designation not preclude any future overbuild or vertical addition to the structure.

The Chestnut Street and Sansom Street facades are the only remaining historical components of the Building’s exterior.¹ In addition, preservation of anything beyond the Chestnut Street and Sansom Street facades would undermine the CMX-5 zoning designation made by City Council and reiterated by the Philadelphia City Planning Commission’s plan for the Central District (a zoning map is included as Exhibit A and an excerpt of the Central District Plan is included as Exhibit B).

The CMX-5 district is a commercial mixed-use zoning district that allows for a base floor area ratio (F.A.R.) of 1200%, i.e. allowing a high-rise without any height limit. Given

¹¹ The Building’s rooftop currently operates as a parking garage and is comprised of modern, non-historic materials. An image of the existing rooftop parking garage is attached here as Exhibit C.

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that the Property contains only a two-story structure, the CMX-5 district permits, by-right, approximately 133,000 sq. ft. of additional gross floor area above the existing Building.² Any regulation by the Historical Commission precluding such additional development of the Property would, effectively, result in a down-zoning of the Property.

Alternatively, if the Historical Commission is unable to limit the designation to the facades only, we request that the designation incorporate the following language, consistent with other designations in Philadelphia:

“This designation shall not preclude an addition on top of the existing structure. The addition would be required to be submitted to the Phila Historic Commision and would effectively be required to conform with the NPS Standards of Rehabilitation requirements that the addition distinguish itself from the style and character of the existing building facades.

It is assumed that the addition will not necessarily be considered compatible in massing, scale and proportion, but this individual designation shall not preclude an "overbuild addition," without diligent consideration by the PHC. It is understood that the property owner will be required to retain as much of the historic building's facades including the primary Chestnut Street facade and secondary Sansom Street facade.”

Lastly, we'd like to highlight that since its purchase of the Property in 2014, the Owner has remained an excellent steward of the Building, including the hiring of a historic preservation consultant (Heritage Consulting) to advise on the façade restoration, structural repairs, and masonry work, which improvements were all undertaken shortly after the Owner purchased the Building. This extensive restoration was performed *electively*, prior to the submission of the historic designation nomination in 2022. The Property Owner fully intends to continue its stewardship of this important Building in the years to come.³

Thank you for your consideration of this request. We look forward to discussing the historic nomination of the Property with the Committee on Historic Designation on February 19, 2025.

² The CMX-5 zoning district is the highest zoning designation for any commercial district in Philadelphia.

³ However, the imposition of a designation precluding development would strip the Property Owner of value and frustrate the ability to finance future historic improvements.

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Very truly yours,

A handwritten signature in black ink, appearing to read 'Matthew N. McClure', with a long horizontal flourish extending to the right.

Matthew N. McClure

MNM/sab

cc: Sarina Rose
Ryan McCaffrey, Esq.
Meredith Trego, Esq.

Exhibit A

Zoning Map – 1520 Chestnut Street

Atlas


1520-22 CHESTNUT ST
PHILADELPHIA, PA 19102-2707

Zoning

Base district zoning maps, associated zoning overlays, and Registered Community Organizations applicable to your search address. If you notice a discrepancy, please contact planning@phila.gov. Source: Department of Planning and Development

There is 1 active parcel at this address


0015210117

Base District		
	CMX-5	Center City Core Commercial Mixed-Use

[See more info about zoning codes \[PDF\]](#)

Pending Bills (0)

Bill Type	Current Zoning	Pending Bill
No pending bills found		



1520 Chestnut

CMX-5

Chestnut St

Stock Exchange Pl

S 15th St

Easements
Trans Parcels
Rights of Way

Feedback

Exhibit B

Central District Plan – Proposed Zoning

(Attached)

Proposed Zoning

The zoning of a parcel is analyzed to ensure that it can implement the desired future land use. Zoning is the primary tool to regulate land use (use), where a building can locate on the property (area), and building size (bulk). The zoning in most of the district will remain as-is since many of the uses are appropriate and should continue into the future. In some areas, the zoning does not match the existing and future land use and, therefore, requires **Corrective Zoning**. Other areas are targeted for long-term transition to new uses and development as envisioned by the community through the planning process. These zoning revisions are referred to as **Zoning to Advance the Plan**.

On the next pages, proposed priority recommendations are called. Additional zoning changes are outlined in the Zoning Appendix.

Corrective Zoning

Matches zoning with existing land use.

These are areas where the “mismatch” may cause unnecessary zoning variances or certificates, or allow an inappropriate use.

Proposed Zoning Map Legend:

		Existing Zoning	Proposed Zoning	Reason for Rezoning
Corrective Zoning	1. Multiple Locations	RM-1	RSA-5	Align Zoning to the existing land use. These are areas where the “mismatch” may cause unnecessary zoning variances or certificates or allow an inappropriate use.
	2. Northern Liberties	I-2 and ICMX	mixed	
	3. Chinatown	CMX-3	CMX-2	
	4. Old City	ICMX	CMX-3	













	Residential Single-Family Attached	RSA-1; RSA-2; RSA-3; RSA-4; RSA-5
	Residential Two-Family Attached	RTA-1
	Residential Multifamily	RM-1; RM-2; RM-3; RM-4
	Auto-Oriented Commercial	CA-1; CA-2
	Neighborhood Commercial Mixed-Use	CMX-1; CMX-2; CMX2.5
	Community/Center City Commercial Mixed-Use	CMX-3; CMX-4
	Center City Core Commercial Mixed-Use	CMX-5
	Light Industrial	I-1
	Medium Industrial	I-2
	Industrial Commercial Mixed-Use	ICMX
	Industrial Residential Mixed-Use	IRMX
	Institutional Development	SP-INS
	Recreation	SP-PO-A; SP-PO-P
	Zoning Change	



Exhibit C

Existing Rooftop Parking Garage



