

**PUBLIC COMMENT ON
1435-41 WALNUT STREET
APPLICATION**



PRESERVATION ALLIANCE

for greater philadelphia

February 10, 2025

Dr. Jonathan Farnham
Executive Director
Philadelphia Historical Commission
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Re: 1435-41 Walnut Street, aka The Drexel Co. Building

Dear Dr. Farnham,

The Preservation Alliance once again urges the denial of the application before the Historical Commission to enlarge five window openings at the above-referenced property as we did the last time this matter came before you.

The Drexel Co. building has stood proudly for nearly a century as one of Philadelphia's premiere commercial landmarks. The building was listed on the Philadelphia Register of Historic Places in 1971 and was individually listed on the National Register of Historic Places in 1980.

The National Register nomination (excerpt attached) argues that *"The Drexel Company building is a significant architectural achievement, a major urban landmark that focuses and organizes perception in the city, a monument to Philadelphia's most important financial organization in the late 19th and early 20th centuries...For all these reasons, and more, the building holds an extraordinary attractive power...For the Drexel Company, the architects achieved a building of great power that impresses itself on its region – not with the violent individualism of the high Victorian, or the great height of the New York 1920s, instead the forcefulness comes from the interplay of abstract architectural qualities, scale and mass, ruled by proportion."* Elsewhere, the nomination asserts, *"This is a building with a capital B, architecture in the grand manner all too rare in Philadelphia. It is this quality that makes it the focus of its corner and gives it its urbanistic role."*

Clearly, we must be cautious in sanctioning alterations to such an important and prominent architectural landmark. The application before the Commission today proposes changes that will significantly alter the appearance of the Drexel Co. building, most likely permanently.

We question the validity of the claim that Drexel Co.'s former banking hall has failed to attract a tenant due to the configuration of the building's lower-level windows.

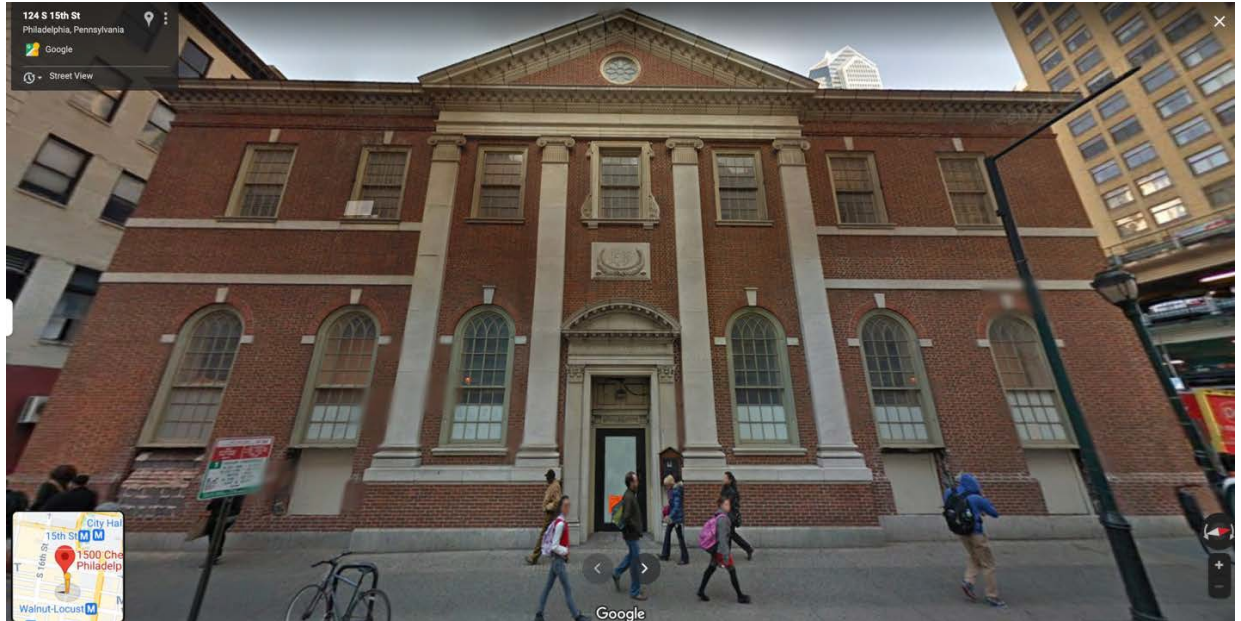
South Fifteenth Street in Center City is a veritable "Bankers Row" of grand, architect-designed banking halls built during the first half of the 20th century. In fact, there are three such banking halls within a couple blocks of the Drexel Co. building. All three have long been successfully repurposed for restaurant use despite similar window configurations -- including one that previously enlarged its window openings, only to close them back up upon securing its current tenant. In addition, the former University Club at 16th & Locust serves as another example that is detailed below. (Unless otherwise noted, all images are via Google StreetView):

- 1) The Packard Building (1924, Ritter & Shay architects), 111 S. 15th Street @ Chestnut: Del Frisco's restaurant has occupied the former banking hall of this high-rise tower since 2008, even though the windows along the 15th Street façade are set *even higher off the sidewalk* than those of Drexel Co., at a height of approximately 10 feet (as compared to 8 feet at Drexel Co.). In addition, like Drexel Co., the banking floor, now serving as the dining room, sits upon a raised podium set well above sidewalk level.

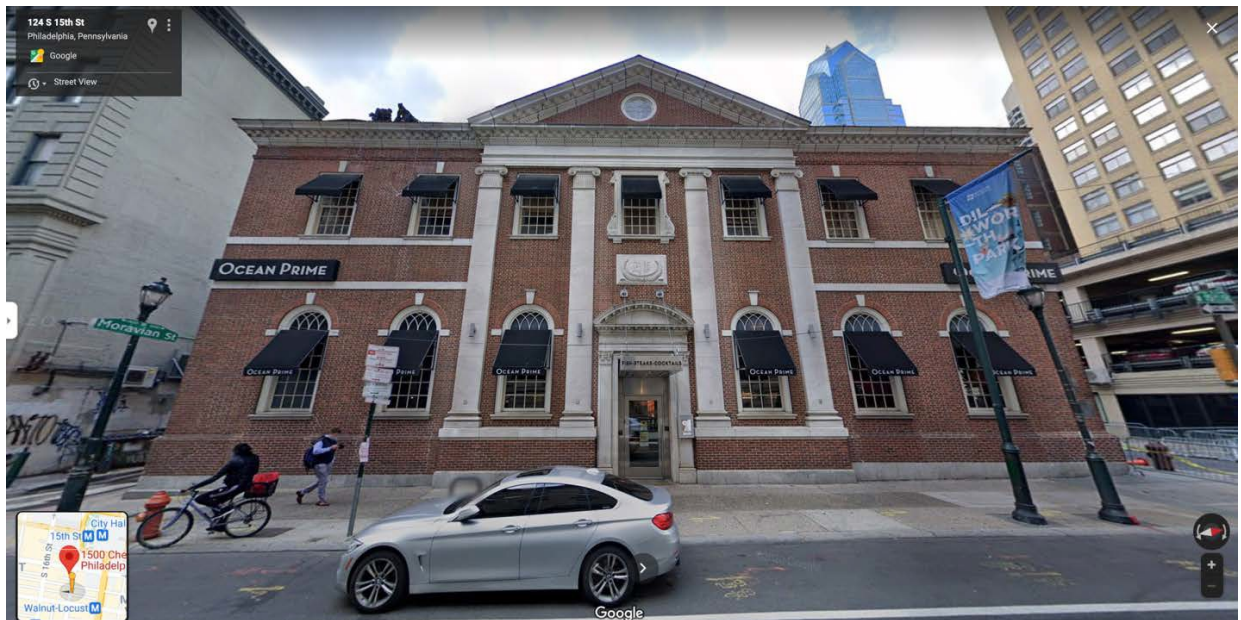


PACKARD BUILDING/DEL FRISCO'S

- 2) Real Estate Trust Company building (1947, Sydney E. Martin, architect), 130 S. 15th Street: Prior to Ocean Prime restaurant's opening in 2013, the ground floor windows of this building were enlarged by removing several feet of original brick: four windows along S. 15th Street and two facing Sansom Street. Later, before the restaurant opened, these enlargements were reversed and filled in, using similar color brick to match. To this day, the scars beneath each window are easily visible where work was done.



130 S. 15TH STREET, MARCH 2012: LOWER LEVEL WINDOW OPENINGS UNDERGOING ENLARGEMENT

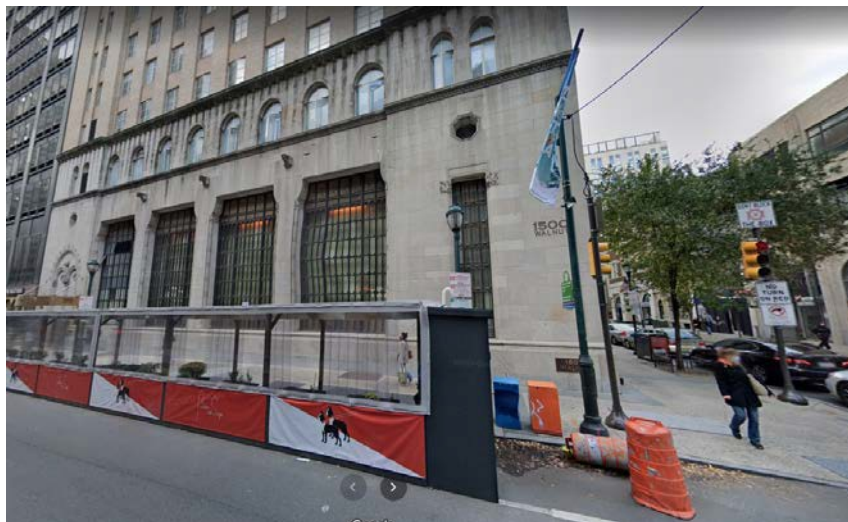


130 S. 15TH STREET, NOVEMBER 2020: WINDOW OPENINGS CLOSED BACK UP



130 S. 15TH STREET. DETAIL OF CLOSED-UP WINDOW OPENING SHOWING SCARRING FROM REVERSED ENLARGEMENT. PHOTO BY PAUL STEINKE, 8/17/21.

- 3) First National Bank of Philadelphia building (1927, Ritter & Shay architects) 1500 Walnut Street: Butcher & Singer restaurant opened in 2008 in the former banking hall of this high-rise Art Deco office tower. While the building's windows are positioned closer to the sidewalk than at Drexel Co. (which sits diagonally across the street), the restaurant covers the windows with louvered interior shades at all times. Visibility from the street is clearly not a high priority for Butcher & Singer.



1500 WALNUT STREET SHOWING LOUVERED SHADES AT BUTCHER & SINGER RESTAURANT.

- 4) University Club (1929, Grant Simon architect) 1601 Locust Street: Originally home to a private men's club, it was transformed at the turn of the century into luxury condominiums with a ground floor retailer. Suitsupply, a Holland-based retailer of men's suits, separates, footwear, and accessories, has occupied a two-story, 4,300-square-foot boutique in the building since 2013.



1601 Locust St. with its two raised ground-floor windows

We believe that the Drexel Co. application before you overplays the issue of visibility. Each of the buildings described above, including Drexel Co., share a significant architectural feature: a grand and heavily ornamented main entrance that heralds each building's presence. In the four examples above, these monumental entrances actually help call attention to the restaurant tenants inside.

As this letter demonstrates, windows have evidently not been a problem for the other buildings in attracting and retaining their retail tenants. There is no guarantee that the proposed Drexel Co. alterations will succeed in delivering a tenant. However, the proposed changes will likely be permanent despite being technically reversible.

The Preservation Alliance stands firm in its belief that adaptive reuse is essential to breathing new life into historic buildings. However, it should not come at the expense of significant architectural fabric or detail, as confirmed by Standard 9 of the Secretary of the Interior's Standards for Rehabilitation. The proposed window enlargement scheme constitutes the loss of significant architectural fabric and should be denied again.

Sincerely,

Paul Steinke
Executive Director

March 10, 2025

Mr. Zachary Frankel, Chair
Philadelphia Historical Commission
One Parkway
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Dear Chair Frankel;

The Drexel Building at 1435-41 Walnut Street is a nationally recognized historic building. To quote from the National Register nomination, this is "...a building of great power that impresses itself on its region" "...the forcefulness comes from the interplay of abstract architectural qualities, scale and mass, ruled by proportion. The scale is most apparent in the immense windows and doors, and the grand story height brought into focus by two carefully scaled elements – the blocks of stone whose volume is emphasized by the deeply cut coursing, and the curved water table – too tall to sit on – that projects from the building's base." "This is building with a capital B, architecture in the grand manner all too rare in Philadelphia."

The current building owner seeks to alter this monument to make the first floor space more suitable for retail use, claiming that the lack of windows and views into the space by passersby on the street is the major reason he has failed to secure a tenant for this space. Several facts belie this opinion:

- While we are all focused on this space, it is not the whole building. The floors above seem to be well and steadily occupied (though I was unable to definitely confirm that). There is still significant income, or income potential, from the five floors above. Additionally, this space has historically been vacant for much of its life, as stated on Page 43 of the application, yet no evidence is presented to suggest that the lack of windows is the cause for the longstanding difficulties in leasing this space.
- In a walk down the 1500 block of Walnut Street on February 21, 2025, it is evident by the number of vacancies that storefront windows are no guarantee in this very uncertain retail climate.

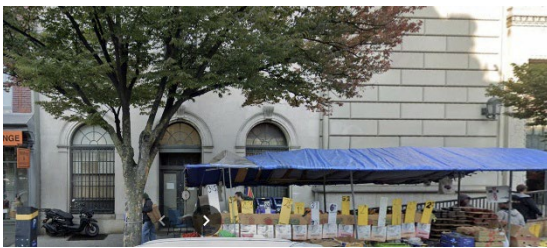


- And, many active retail spaces with good visibility nevertheless choose to block their windows, for reasons known only to them, while at the north end of this 15th Street block, a successful restaurant occupies a space with similarly high windows.



A quick Google search of the properties mentioned in the Riddle Company report (included in the application) reveals that most of them are not directly comparable to the Drexel building, nor do they illustrate the point the consultant is trying to make.

- Heinen’s Market in Cleveland has good visibility from street windows in an adjacent building which, while historic, is of a very different style and form; the main historic building on the right, which is more analogous to the Drexel Building, does not appear to have been altered.

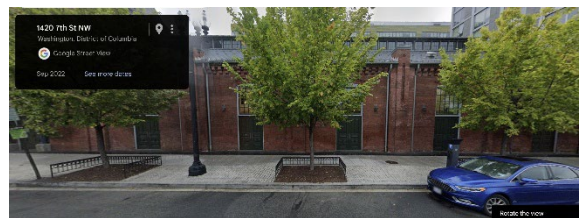


- The Trader Joe’s building in Brooklyn Heights has five windows on the Atlantic Avenue side, all with sills far above the sidewalk. On the Court Street side (shown), the main building has no windows, only a ramp and entrance door. The adjacent building has two large windows with low sills, and a central entrance door; all are obscured from the inside with solid material.



- The Restoration Hardware building has been so altered that the original factory building is totally subsumed.

- The Giant food store in a historic market building in Washington, DC has no windows open to view from the street, yet despite that is cited as “the best performing Giant in the chain”; the absence of windows is clearly not an issue.



- The Union Market in Washington, DC is a completely different building type and setting, and is not comparable to the Drexel Building in either architectural significance or street presence.

- The Ponce City Market, while an admirable adaptive reuse project, is again not particularly comparable, either by building type or urban setting.



It is understandable that the current owner of the Drexel Building is frustrated by the lack of a tenant for this space. I am not a real estate professional, nor an expert in retail leasing, but even to a layperson, the facts seem to indicate that there is much more going on here than a simple lack of visibility. There is no evidence that altering the windows will make any difference to the leasing potential of the space – there are too many other contributing factors (a general malaise in the market for retail space; the rent may be too high; the uncertainty being brought to the economy by interest rate fluctuations; etc.)

This is a monumental building, nationally significant, on one of Philadelphia's premier streets. Hundreds of people walk past it every day. If the purpose of our preservation ordinance is to preserve buildings in the public interest, then this building should not be further altered. I strongly oppose this proposal.

Very truly yours,

Katherine Dowdell

Katherine Dowdell, AIA

Cc: Jonathan Farnham, PhD, Executive Director
All members of the Architectural Committee; the Designation Committee; and the full Commission
Paul Steinke and Hannah Stark, Preservation Alliance for Greater Philadelphia