



CITY OF PHILADELPHIA

PHILADELPHIA HISTORICAL
COMMISSION

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Sam Sherman, Jr.
Chair

Jonathan E. Farnham, Ph.D.
Executive Director

26 May 2009

Paul Levy, President & CEO
Center City District
Public Ledger Building
660 Chestnut Street
Philadelphia, PA 19106

Re: Dilworth Plaza, City Hall, Philadelphia, Pennsylvania

Dear Mr. Levy:

In accordance with Section 106 of the National Historic Preservation Act of 1966, as amended through 2006, and the regulations (36 CFR 800) of the Advisory Council on Historic Preservation, as amended through 2004, the Philadelphia Historical Commission wishes to participate as a Consulting Party and comment on the plaza reconstruction proposal for Dilworth Plaza at City Hall, Philadelphia, Pennsylvania.

The Commission notes that City Hall was individually listed on the National Register of Historic Places on 8 December 1976. Although completed about 1974, only two years before the designation, Dilworth Plaza is included within the boundary of the City Hall designation as defined in the National Register nomination. City Hall is also located within and contributes to the Broad Street National Register Historic District, which was designated on 6 April 1984.

The Commission contends that the proposed reconstruction of Dilworth Plaza complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties and would therefore have **no adverse effect** on historic resources at the City Hall site. The Commission asserts that Dilworth Plaza itself has no historical significance but is merely located adjacent to and on the site of a historically significant building. The Commission also asserts that the project has no potential for disturbing archaeological resources, owing to the major ground disturbances at the site with the construction of Dilworth Plaza and related transit stations and concourses. The Commission finally asserts that the reconstruction of the plaza with the transit entrances, food service building, fountain, lawn, and other features would have no negative impact, physical or visual, direct or indirect, on the historic City Hall building.

Please note that, although unrelated to any state and federal jurisdiction, the Commission designated City Hall as historic on 28 May 1957. Under the municipal historic preservation ordinance, Section 14-2007 of the Philadelphia Code, the Commission reviewed and granted in-concept approval to the Dilworth Plaza reconstruction project on 9 April 2009. Thank you for this opportunity to comment.

Yours truly,

A handwritten signature in black ink, appearing to read "Jonathan E. Farnham".

Jonathan E. Farnham, Ph.D.
Executive Director