



Commonwealth of Pennsylvania  
Pennsylvania Historical and Museum Commission  
Bureau for Historic Preservation  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
Harrisburg, PA 17120-0093  
www.phmc.state.pa.us

April 24, 2003

Thomas D. Smithgall  
High Real Estate Group  
P.O. Box 10008  
Lancaster, PA 17605-0008

TO EXPEDITE REVIEW U  
BHP REFERENCE NUMB

Re: ER 03-0246-071-A  
GBO: Penn Square Hotel and Convention Center, Watt &  
Shand Rehabilitation and Construction of Convention Center,  
City of Lancaster, Lancaster Co.

Dear Mr. Smithgall:

The Bureau for Historic Preservation has reviewed the above named project under the authority of the Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988). This review includes comments on the project's potential effect on both historic and archaeological resources.

As we have not received any correspondence from you since our meeting of 17 October 2002, we are providing the following preliminary comments based on the proposed project as it was initially presented.

The proposed project is receiving a substantial amount of public money and is a joint public/private venture. The project consists of the reuse of the Watt & Shand Building as a convention hotel, rehabilitation of the Montgomery House, demolition of the Oberlander Building, demolition of significant portions of the Thaddeus Stevens House, Kleiss Saloon, and Smith House, and construction of a convention center. The Lancaster County Convention Center Authority will develop the convention center portion of the project using public money and the Penn Square Partners proposes to reuse the Watt & Shand Building as the convention hotel.

For the purposes of the comments the Bureau must make under the State History Code and under the National Historic Preservation Act (Section 106), these activities would be considered one project because it falls in the Lancaster Historic District and is being developed as a seamless single project. Although the Thaddeus Stevens House, Kleiss Saloon, and Smith House are owned by a separate entity, they are contributing buildings in the historic district and are going to be affected by the proposed project. The Historic Preservation Trust of Lancaster County is also receiving public funds to develop projects in response to and necessitated by the Convention Center project. All of these projects must be reviewed in consultation with the Bureau for Historic Preservation.

Given the extent of development and demolition, it is our opinion that the project as proposed does not meet the *Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings* and therefore will adversely affect the Lancaster Historic District. In addition, due to the extent of development and demolition, it is our opinion that the National Park Service would not approve the project for federal tax credits. The following aspects of the proposed project do not meet the Standards:

- The Oberlander Building, a major contributing building to the historic district, will be demolished for the Convention Center. Substantial portions of other contributing buildings will also be demolished and portions will remain as remnants that will be surrounded by the new convention center.
- A 12-story tower for [220 rooms] will be added on top of the Watt & Shand building. Its location on top of the historic building is grossly out of scale and character with the historic building.
- The project will also result in a substantial change in character to the Watt & Shand building because of the extensive changes needed to make the building a convention center hotel. 1) From what we can tell, there will be no sense that one is entering into a former department store as a result of creating a substantial 4-story [full-height] atrium, a seamless connection to the convention center, the removal of all surviving historic fabric [plaster beams and columns, pressed metal ceilings, relocation of the elevators to relate to the new tower, loss of historic stairs, replacement of all original sash. 2) The removal of the original display windows and recess a new exterior wall on the principal elevation in order to create an arcade is inconsistent with the building's historic character.

At the end of the meeting on 17 October 2002, you agreed to consider some revisions to your proposal as they pertain to the above issues and in particular the location of the 12-story tower and reduction of the size of the atrium. We recommend that you continue to consult with the Bureau as your plans are developed by providing us with updated plans.

We also recommended at the October meeting that all concerned parties meet together to discuss the project and ways to proceed with the required reviews. Such a meeting was subsequently scheduled but later cancelled. We again strongly recommend that all concerned parties meet together as soon as possible. The Bureau supports the appropriate rehabilitation of the Watt & Shand Building and the other contributing buildings in the project site and is anxious to continue the consultation process for this project.

There is a high probability for historic archaeological sites in the area of this project. It is our understanding that the Lancaster Trust has already undertaken archaeological surveys in the area of the Thaddeus Stevens House. Because this is being considered as one project, all archaeological investigations must meet the Secretary of Interior's standards for

