

*Evaluation of the inappropriateness of historical designation of the 700 block of Sansom Street
and the proposed "Jewelers Row Historic District" by the Philadelphia Historical Commission*

Prepared by Civic**Visions**, LP

2.13.20

For Michael Phillips
Obermayer, Rebmann, Maxwell & Hippel, LLP
1500 Market Street
Philadelphia, PA 19102

Introduction:

A nomination has been prepared by the Preservation Alliance for Greater Philadelphia to historically designate the entirety of the row of buildings along the 700 block of Sansom Street, together with adjacent portions of 7th Street, 8th Street and the eastern end of the 800 block of Sansom Street as “Jeweler’s Row” ostensibly on the grounds that buildings there at various times between 1900 and 1970 have served the jewelry business.

- The nomination was precipitated by the controversy over the by right construction of a proposed 24-story apartment tower at the east end of the block that complies with the area’s prevailing CMX-5 Zoning Code classification.
- That project has recently resulted in the demolition of 6 buildings located at 124 S. 7th Street and between 702 and 710 Sansom Street.
- With this new residential tower and other rebuilt and reconstructed facades, more than half of the south side of the 700 block of Sansom Street has already been demolished and character-defining features are now mainly lost.
- The north side of the 700 block of Sansom Street was originally less unified, being built in multiple phases, but is also similarly altered with similar loss of character-defining features.
- Because of these alterations and demolitions, neither the 700 block of Sansom Street nor the proposed “Jewelers Row Historic District” meets the specific requirements of the criteria of the Philadelphia Historical Commission requirements to be considered part of significant, historic places within Philadelphia, including areas within the immediate vicinity such as Independence Square or Washington Square.
- Likewise, the buildings located within the proposed district were not included within the 1999 designation of the Society Hill Historic District, which directly abuts the proposed district to both the south and east.
- The location, street width and brick paving of the 700 block of Sansom Street location are already protected, as part of the Historic Street Paving Thematic District width and brick paving.
- No research has been undertaken in the nomination to establish the history of jewelers’ districts in Philadelphia or in other American cities. For example, the nomination fails to mention that Philadelphia had an earlier jewelers’ district on South 2nd Street. Nor, as claimed in this nomination, was this by any means the oldest jewelers’ district in the United States, being predated by a full century by New York’s Maiden Lane jeweler’s district.
- Poor research leading to factual inaccuracies should disqualify this nomination. The nomination is rife with inaccurate statements of fact, incomplete research, speculative conclusions and needless hyperbole.
- Designation by use is clearly inappropriate because uses are dynamic and not made permanent by any mechanism of planning or law and are not visually represented when uses change. Urban districts routinely change their function and their identity, as exemplified by the actual history of the 700 block of Sansom Street, which has consistently and adeptly evolved uses over the past two centuries and is actively undergoing such a change in use at the present time.

- As a result of the clear evidence of the extent of such alterations to the architecture and buildings located in the proposed district and the clear pattern of loss of jewelry trade businesses that is demonstrated below in this report, this area does not meet the criteria of the Philadelphia Historical Commission and therefore should not be historically designated.

Despite the clear physical evidence of the extent of alterations that undermine integrity and the equally clear momentum toward other uses that undermine any consensus of use, the nomination asserts that the proposed district meets essentially every criterion for designation of the Philadelphia Historical Commission, with the exceptions of criteria b), f), and i).

The proposed district does not meet the requirements of any of the enumerated criteria in not possessing the high degree of value represented by the criteria's call for being significant, possessing distinguishing features, or exemplary character. Criteria for designation by the Philadelphia Historical Commission are exemplary in nature requiring superlative attributes that are considerably better than average.

Buildings or districts meet the criteria if the building or district:

- Has ***significant*** character, interest or value as part of the development, heritage or cultural characteristics of the City, Commonwealth or Nation or is associated with the life of a person ***significant*** in the past; or,
- Is associated with an ***event of importance*** to the history of the City, Commonwealth or Nation; or,
- Reflects the environment in an era characterized by a ***distinctive architectural style***; or,
- Embodies ***distinguishing characteristics of an architectural style*** or engineering specimen; or,
- Is the work of a designer, architect, landscape architect or designer, or engineer whose work has ***significantly*** influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth or Nation; or,
- Contains elements of design, detail, materials or craftsmanship which represent a ***significant innovation***; or,
- Is part of or related to a square, park or other ***distinctive*** area which should be preserved according to an historic, cultural or architectural ***motif***; or,
- Owing to its ***unique location or singular physical characteristic***, represents an established and familiar visual feature of the neighborhood, community or City; or,
- Has yielded, or may be likely to yield, information important in pre-history or history; or
- Exemplifies*** the cultural, political, economic, social or historical heritage of the community.

Summary Conclusion:

The proposed district as an entity does not meet the criteria of the Philadelphia Historical Commission which in every instance requires a superlative level of significance or cultural

representation. Because of numerous alterations and demolitions, as well as a lack of significant, notable architectural merit as a whole, the proposed district falls well short of the threshold for any of the Historical Commission's criterion for historic designation. Further, the nomination fails to persuasively make the case for any of the criteria by providing clear and compelling comparisons that the proposed area meets the specific criteria. The following points will be developed below:

- The buildings and sites that have already been designated accurately protect the best of the historic resources of the area.
- These previously designated sites include the brick street surface and oversized width of the 700 block of Sansom Street which is part of the City's Historic Street Paving Thematic District and the individual buildings at 700 and 732-34 Sansom Street which are the least modified of the original row of houses of Carstairs Row; the multi-story Press Building on the north side of the street at 701-707 Sansom Street designed by T. P. Chandler; and the much altered addition to the previously demolished Philadelphia Times newspaper office on 104-06 S. 8th Street.
- The nomination is inaccurate in its evaluation of the buildings which are significantly more altered and show significantly less integrity than is represented in the nomination. As a result, the buildings do not meet the test of significance warranting designation.
- This report demonstrates that the 700 block of Sansom Street and the surrounding area is part of the continuously evolving fabric of the City that is rapidly moving away from its former use and should not be frozen to a use that is rapidly disappearing.
- Given the extent of changes that have recently occurred in the block, it is the conclusion of this report that the ensemble of properties does not meet the threshold criteria for historic designation and should not be designated as an historic district.
- It is further contended that designation would go against the present CMX-5 zoning of the block and replaces the purposes and goals of City Council and the City Planning Commission which clearly intends greater density in the vicinity of the best city transit, with the goals of the Preservation Alliance of Greater Philadelphia which seeks to thwart future development in the area.
- It is inappropriate to designate buildings on the 700 block of Sansom Street and those to the west based solely on transitory uses when these buildings are so widely divergent and in most cases so undistinguished and have had other uses into the 20th century.
- Finally, and most critically, the proposed district should not be frozen in a past use that is already the third principal use of the area and is now rapidly shifting to a fourth use.
- If it is determined that there are individual buildings that retain high integrity, they may be nominated individually and considered on their own merits.

Criteria evaluations:

(a) Has significant character, interest or value as part of the development, heritage or cultural characteristics of the City, Commonwealth or Nation or is associated with the life of a person significant in the past;

To demonstrate that a block or group of buildings has significant character capable of meeting the criterion, it is necessary to evaluate the integrity of the block and to look comparatively at other similarly purposed blocks in the City. This has not been done in the nomination.

- While the 700 block of Sansom Street originally had an architectural unity on the south side, that unity has long since been destroyed in a host of alterations and reconstructions such that the three-story cornice height is now mainly overridden by later facades and entirely new buildings.
- Of the original Carstairs Row, only 3 out of 22 buildings retain enough general features sufficient to identify them and those 3 buildings are each already individually designated on the register.
- The claim is made that this row was the “first entire block of identical, speculative row houses” in the history of the city. (See nomination at p. 73.) That claim is obviously wrong and should have been removed by the Historical Commission’s staff which should know that the 700 block of Walnut Street, by Benjamin Latrobe, was earlier, is more significant, and is in more intact condition. The claim of “earliest” should never be used as a justification because it is so easily disproven.
- Further the “complete block” claim is a red herring that ignores numerous examples of rows of houses – meaning more than two buildings on the same plan -- such as the earlier 18th century 100 block of Cuthbert Street as well as other far more monumental and intact rows such as Portico Row or the impressive blocks in the Rittenhouse Square neighborhood. These other examples have significant architectural meaning, unlike the jumble on Sansom Street.
- Blocks of residential buildings modified into commercial districts are typical across Philadelphia as residential streets were adapted for commerce across the city. No effort is made in the nomination to compare such districts nor is there any historical overview of the changes that such districts have undergone and are undergoing in the changing city.
- The feature that gives this block distinction is its greater width that breaks the standard street grid. That feature and the street itself is already historically designated as part of the Historic Street Paving Thematic District. Notably, other similarly shifted blocks west of Broad Street are not designated.
- Other street paving districts make no attempt to control the design of buildings along their edges.
- Finally, as is demonstrated below, the peak of the concentration of the jewelry and metal craft industry occurred some 35 years ago and has been in decline ever since. At present the district is far more about small housing units than jewelry-related businesses and that change is accelerating as new retail methods such as the internet supplant older methods of retail and new shopping districts cross Broad Street and expand out into the suburbs.

Conclusion: Criterion a.) is not met. The nomination does not address either the extent of alteration or the physical and use transformations that have already occurred and that will accelerate in the near future. Nomination on the basis of transient uses, in a vain attempt to

freeze buildings in uses that are no longer viable, damages the owners and undermines the dynamism of the city.

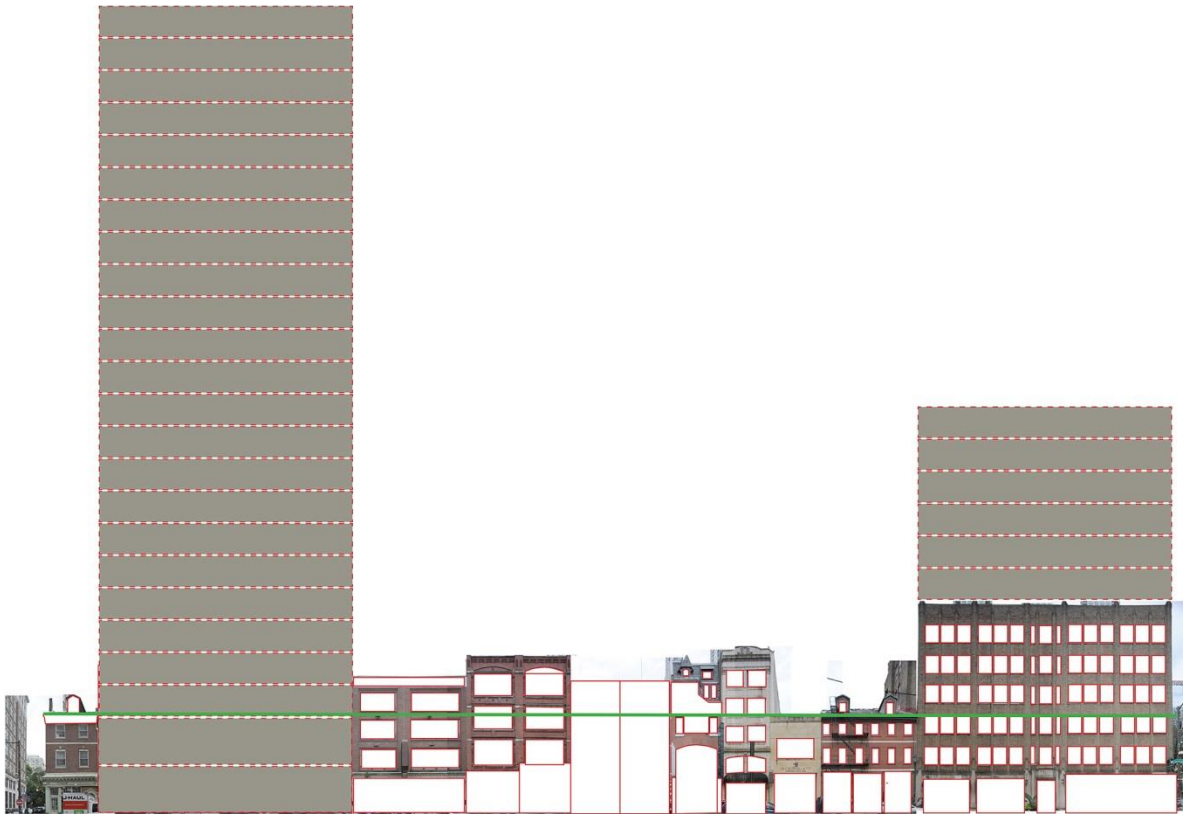
(b) Is associated with an event of importance to the history of the City, Commonwealth or Nation; or,

Not claimed.

*(c) Reflects the environment in an era characterized by a **distinctive** architectural style; or, (d) Embodies **distinguishing** characteristics of an architectural style or engineering specimen;*

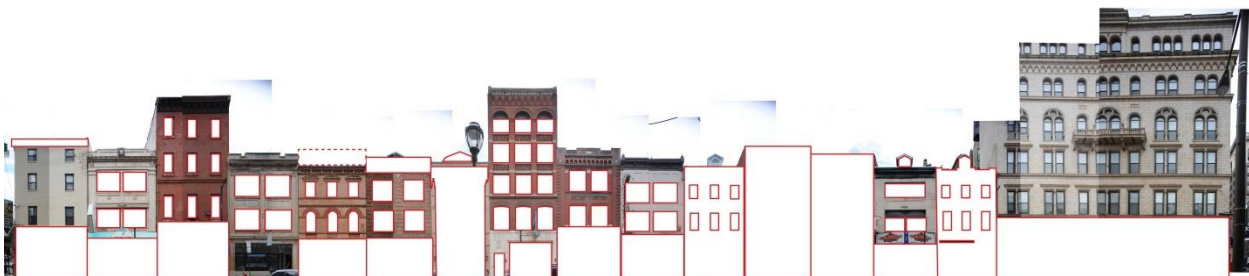
These criteria can be grouped together in that they assert architectural significance either for a distinctive style or for the distinguishing characteristics of an architectural style or engineering specimen. The extended discussion of Carstairs' Row suggests that it was the design features of the original block that purports to support these criteria. Given the demolition or refacing of all but 3 of the original 22 buildings on the south side of the block, the total demolition of more than half of the row and the jumble of styles and sizes of heavily altered ordinary commercial buildings that have resulted, neither criteria is met.

- Examples of rows of houses are a standard across the city. A claim to significance for a row would logically be met by the extent of the architectural unity of the block and the quality of the particular design and, in some instances, by the significance of the designer.
- In the case of the 700 block of Sansom Street, that characteristic of unity was gone by the early 20th century when various refacings, reconstructions, and total rebuildings introduced multiple building typologies that broke the original unity, often doubling the three-story cornice height and breaking the building line into a heterogeneous block without obvious unity.
- Better examples of early federal style rows exist including the aforementioned adjacent Latrobe Row on the 700 block of Walnut Street and York Row on the south side of the 700 block of Walnut Street, which has three facades together. By contrast, only two contiguous but much altered facades of the 700 block of Sansom Street remain to suggest that this once was a row.



700 block of Sansom Street, south side, elevation showing modern alterations, demolitions and loss of integrity and size of Toll Brothers tower and addition proposed on top of Jewelers' Building

- The extent of alterations to most buildings, from removed cornices and replaced windows to replaced shopfronts, the three most character-defining elements of an urban façade, mean that these buildings do not meet the test of a style. No claim is made for engineering.
- The north side of the block is similarly altered with an oversized Victorian office building, itself shorn of its entire monumental base of shop front facades and windows (both critical character-defining features), occupying the five eastern-most sites and with mid-block buildings characterized by multiple refacings and rebuildings. The disparity of materials and sizes and loss of character-defining features again undercuts any claim to architectural significance.



700 Block of Sansom Street, north side showing major alterations, façade replacements and large Victorian office building

- Alterations to these buildings are ignored in the nomination which did not comprehensively research obvious sources such as the Philadelphia Zoning Archive. For example, the nomination fails to adequately discuss significant alterations to buildings including, by way of example, 711, 717, 733, 737, 801, 805 and 807 Sansom Street and 126 and 128 S. 8th Street.
- The description of certain isolated surviving features of drastically altered buildings such as “vestiges of end piers” on a totally rebuilt building, “marble stoop, and bronze lettering in sidewalk” implies more historic fabric than in actuality exists. Coupled with a significant number of non-contributing buildings and the larger number of buildings that should be considered non-contributing on the basis of the extent of alterations, this evidence should have argued against the nomination of the ensemble.

Conclusion: Criteria c) and d) are not met because the nomination does not address the means by which these buildings are distinguished. Instead of a distinctive style, the undesignated buildings are a hodge-podge of much-altered undistinguished types. Presumably the nomination does not address this issue because the character-defining features that might have given the buildings distinction have long since been removed and the resulting buildings do not meet the criteria for designation.

(e) Is the work of a designer, architect, landscape architect or designer, or engineer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth or Nation;

Ever since the author of this report discovered the *Philadelphia Real Estate Record and Builders' Guide* and the building columns from the *Philadelphia Inquirer* for the basic research for *The Architecture of Frank Furness* catalog in 1971, it has been relatively easy to create a record of any architect – no matter how minor.

Most of the commercial facades that are listed are the work of third and fourth-tier architects of little or no consequence to the history of Philadelphia architecture. Of the few architects of note for whom the case of significance can be made including Collins & Autenrieth, Theophilus Chandler, Louis Magaziner, and Ralph Bencker, their works have either been demolished (*e.g.*, Collins & Authereith) or in the case of the Chandler and Bencker, the buildings are atypical of the scale of the 700 block of Sansom Street, or are better represented elsewhere.

- The buildings designed by Collins & Autenrieth have been demolished for the coming Toll Brothers building. There is no designation category for demolished buildings.
- The idea that a variety of different architects working in different styles on a block creates a “catalog of Philadelphia architectural history” presents Philadelphia’s history as a minor and sorry affair. Apart from T. P. Chandler and Ralph Bencker, these architects are neither exemplary nor do they have significant careers as demonstrated by their brief biographies in the encyclopedic *P.A.B.* catalog. In one instance, a “possible

but unconfirmed Frank Furness design,” the minor building adds nothing to our understanding of his career and has been savagely altered – since the 1984 National Register Nomination.

- The other listed architects in the nomination are of so little significance that their P.A.B biographies are little more than a single sentence and there is no interest in their careers as evidenced by the lack of biographies or other studies:
 - M. M. Boonin (no P.A.B. biography),
 - Greisler & Abramson (P.A.B. 3 lines about partnership dates),
 - Arnold Mueller (P.A.B. lists appearances and disappearances from directories with no evidence of significance),
 - P. Orlich (P.A.B. no biography),
 - H. H. Kline (P.A.B. 2 lines, “prolific”),
 - Anderson & Haupt (P.A.B. 2 lines, “partners”),
 - Sol Kaplan (P.A.B. “general practice with a number of additions and alterations”),
 - I. W. Levin (P.A.B. no biography),
 - W. L. Blithe (P.A. B. “office specialty Methodist churches”).

As is demonstrated above in the summaries of their mention in the P.A.B. these designers were of minor consequence and none of them meet the criterion of “... **significant influence** on the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or Nation.”

Conclusion:

Most of the Sansom Street buildings are designed by minor architects and have lost integrity with massively altered new shop fronts, altered window configurations, removal of upper levels, removed or refaced cornices, and infilled or altered window openings. The insignificance of the architects and the loss of character-defining features should obviate Criterion e).

(f) Contains elements of design, detail, materials or craftsmanship which represent a significant innovation;

Not claimed. This would ordinarily reinforce the claims of criterion e. The fact that it is not claimed is further proof that criterion e) is not met.

(g) Is part of or related to a square, park or other distinctive area which should be preserved according to an historic, cultural or architectural motif; or,

While this criterion is checked and listed in the nomination no discussion is made of this point for the obvious reason that it does not apply.

- The commission has long established that proximity to a feature such as claimed for Independence Mall and Washington Square is irrelevant if the buildings are not part of the actual design composition.

- In each of these instances entire city blocks intervene between the mentioned public zones and the 700 block of Sansom Street.
- The widened street and brick material of the 700 block of Sansom Street are not of such significance as to create an “aura” around that block. It has had little if any impact on the nature of the buildings originally constructed or on those constructed more recently.
- Other street paving sites are not used to control the buildings alongside the streets.

Conclusion:

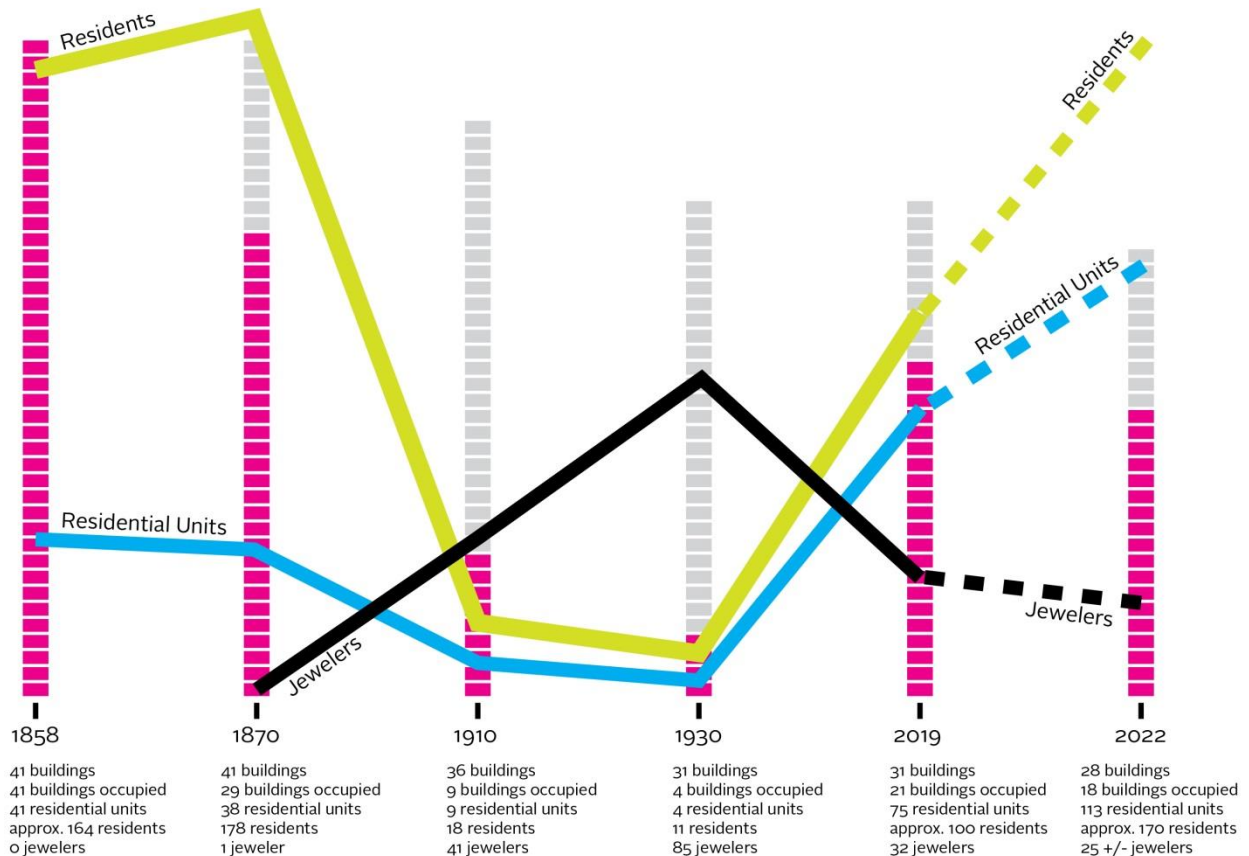
As a result of their distance from the various “parks, squares, or other distinctive areas” this criterion is not met.

(h) Owing to its unique location or singular physical characteristic, represents an established and familiar visual feature of the neighborhood, community or City;

Insofar as every location in a city is unique, the ability to demonstrate a direct connection with the character of a specific place is clearly the intention of this criterion. This might include buildings facing Independence Hall that were designed in reference to 18th century or civic design, buildings that are part of a significant campus, or buildings fronting on the original Philadelphia public squares whose design reflects their civic status. The proposed district meets none of these standards for uniqueness of location or singularity of physical characteristics. “Established and familiar” could apply to any place in the City which again is surely not the intent of the Commission and results in an overly broad criterion that undermines the purpose of designation. At the same time, the extent of alterations that have continued to this day within the proposed district undermines the idea of “established and familiar.”

- Given that the block has been massively altered, it is clearly not the intent of the nomination to form a new category of “façade alterations by minor architects” district.
- The lack of a unique or singular physical characteristic suggests that the purported uniqueness is the present commercial function of the block. Designation of function is clearly inappropriate in a commercial block which would prevent the types of changes that are already occurring as the block shifts from jewelry related business to residential use.
- In the case of the 700 block of Sansom Street, its use by jewelers is now down to much less than 25% of the interior spaces and that use will continue to slide as retail patterns continue to change.
- The fact that a retail district has existed does not mean it must remain forever.
- Other retail districts such as “Bankers Row,” “Insurance Row,” “Restaurant Supply Row,” and “Fabric Row” have all disappeared or, in the case of Fabric Row, moved to other locations and broken into fragments such that it is no longer identifiable.
- The changes presently occurring in the 700 block of Sansom Street are a consequence of changes in retail patterns including the rise of internet shopping. These structural changes in retail are ignored in the nomination.

- The sequence of jewelry retail in Philadelphia began with an earlier district on S. 2nd Street then as the city grew to the west the retail area moved first to the elite shopping district adjacent to the new business district around City Hall (Bailey, Banks, & Biddle, J.E. Caldwell) and has since moved toward Rittenhouse Square with Tiffany’s, William Schwarz and others. It is now increasingly moving west to shops in the Main Line suburbs. Contemporary assessments of the jewelry business in *Philadelphia Magazine’s* list no businesses of consequence in the proposed district.¹



This graph shows the decrease in the number of buildings on the block over time (grey), the increase and then decrease in the number of residentially occupied buildings (red), the increase and then decrease and then the rise again in the number of residents (light green) and residential units (blue), based on US census through 1930 and after 1940 based on building permit information about number of units being permitted); and the corresponding rise and now fall (black) in the number of jewelry businesses that were listed in city directories as spaces no longer desired by the businesses are converted to residential use. The high point of the jewelry and related businesses on Sansom Street occurred between 1930 and 1960 with housing units rising after that date to replace jewelry businesses.

¹ *Philadelphia Magazine* “Best of Philly – Jewelry Boutiques” <https://www.phillymag.com/best-of-philly-archive/awards/jewelry-boutique/>. Other sites devoted to Philadelphia jewelers show scattered sites across the city and suburbs.

Conclusion:

As is evident from the graph, this criterion is not met.

(i) Has yielded, or may be likely to yield, information important in pre-history or history;

This criterion is not claimed.

(j) Exemplifies the cultural, political, economic, social or historical heritage of the community.

This is another dangerous category that undermines successful urban dynamism and takes on the banner of heritage which itself, by definition is a false narrative intended to benefit one group over another.² There is no singular heritage of this community that meets the standard of exemplary and presumably the heritage most celebrated in the area is the nation's independence exemplified in later buildings in the colonial revival styles.

- The 700 block of Sansom Street began as a row of private houses. In the 1858 Hexamer Atlas, the row buildings on both sides of the entire block show the original footprints with no changes to any buildings.
- As late as 1870, the 700 block of Sansom Street was still nearly entirely residential with 111 residents on the north side of the 700 block and 67 residents on the south side of the block. Houses were being split into apartments but only 700, 706, 708, 710 and 712 on the south side and 701 and 703 on the north side were no longer used as housing and some had been replaced by commercial / industrial buildings. (1870 US Census, Philadelphia, 22nd district, 8th Ward, pp. 42-46).
- As late as the 1880 census, the 700 block of Sansom Street remained a residential community with a variety of trades near the advertising and printing business that employed them, including a physician, a sign painter, printers, salesmen, shoe cutters etc. It was representative of the business environment at the edge of the downtown.³
- By 1900, the block had turned into a business district with many working in the metal and graphic trades. This use as a printing center is better represented by the juxtaposition of the Public Ledger and Curtis Publishing facing Independence Square and N. W. Ayer, the advertising firm that provided copy for the great publishing houses on Washington Square rather than the scattered bits of trades that now survive with no recognizable architectural character; by that time only a few buildings had occupants and most were servants or janitors for the businesses. In 1900 there were fewer than 20 residents, all on the north side of the block.⁴ The entire population of the block was

² For discussion of the difference between history and heritage and the danger of heritage practices see David Lowenthal, "Fabricating Heritage," pp.5-24. *History and Memory*, Vol. 10, No. 1, Spring 1998 and Lowenthal, *The Heritage Crusade and the Spoils of History*, (New York, Cambridge University Press, 1998).

³ US Census, 1880, 8th Ward, 1st electoral district, p. 12, Enumeration district #139.

⁴ US Census, 1900, District 1 Pennsylvania, Enumeration District 143, sheet 1.

reduced to 16 in 1920 and most of the households included the janitor or janitress for the building. In 1930 only janitors and their families lived on the block.⁵

- In the 1930s, most of the block was occupied by jewelers (see table from 1930 reverse telephone directory below).
- This has changed dramatically in the last generation with fewer than a quarter of the spaces occupied by jewelers and rare metal dealers.
- At present, the block is shifting back to residential uses aimed at a different audience than the adjacent apartment towers. Of the occupied spaces that will remain after the construction of the new apartment tower, the majority of the interiors are now apartments.
- At the present, the south side of the block contains 30 or more apartments plus the 85 or so units in the new tower. The north side is similarly turning to residential with all of the upper stories of the Press Building containing 35 apartments and with more than 60 additional units along the block.
- No effort was made in the nomination to evaluate the changing uses that characterize the block and that mark the decline of the mid-20th century retail district.
- Again, the failure to access readily available historical data demonstrates the inadequacy of the nomination.

Uses of South side of Sansom Street from Polks's Reverse Directory of Philadelphia, 1930

• 700	3 jewelers, 1 sculptor		
• 702	advertising, artists		
• 704	8 jewelry related; 1 printer		
• 706	12 jewelry related, 1 tailor		
• 708	3 jewelry related		
• 710	9 jewelry related 1 press		
• 712	1 jewelry store		
• 714	7 jewelry related; 1 tailor		
• 716	1 machinist, 1 leather related		
• 718	1 jeweler		
• 720	8 jewelry related		
• 722	7 jewelry related, 2 printers		
• 724	law books		
• 726	13 jewelry related		
• 728	1 jewelry related; 1 optician		
• 730	3 jewelry related		
• 732	3 jewelry related		
• 740	2 opticians	<u>85</u>	<u>13</u>
		Jewelry related	other uses

By the 1930s there were some 200 jewelry-related businesses on the street.⁶

What is the exemplary heritage that is proposed to be perpetuated?

- A jewelry district that is fast disappearing and will soon be gone?

⁵ US census 1920. 8th ward, Enumeration District 172, sheet 1; US census 1930, 8th ward, block 2, enumeration district 51-286, p. 1-A.

⁶ Lance Eisenhower, "Jewelers Row," 2017. <https://philadelphiaencyclopedia.org/archive/jewelers-row/>

- Altered facades of minor importance and no better or worse than many other retail blocks in the city?
- Insofar as claims for significance have been based on individuals such as Henry Charles Lea, the buildings on the block associated with Lea at the east end of the block are now demolished and there are other sites in the city that better represent Lea's contribution to medical publishing, research, and the pursuit of public health including the Lea wing of the University of Pennsylvania Library whose collection and the actual reading room itself have since been transferred to the Van Pelt Library.⁷ The office building of Lea & Febiger still stands on Washington Square.

Conclusion:

As demonstrated in this report, the nominated district does not adequately meet the high tests of significance or exemplification that should be required under the criteria listed of the Philadelphia Historical Commission. The proposed district should not be approved for designation.

Additional issues:

Boundary selection and inappropriateness of extending district beyond 700 block of Sansom Street to include buildings on 7th Street, 8th Street and the 800 block of Sansom Street

While it is the contention of this report that there is no valid justification or reason to designate the so-called Jewelers Row district as historic because, as a whole, the buildings lack architectural or historical continuity or significance and the use purpose as a "jewelry district" on which the designation is based is vanishing and will soon be gone; it is even less appropriate to extend the proposed district beyond the west end of the 700 block of Sansom Street.

Uses in a commercial district should not be the basis for designation – because they can change – as they are doing now.

- Hence there is no reason to include buildings on 7th Street, 8th Street and the 800 block of Sansom Street.
- Historically these buildings were even less associated with the jewelry trades than with other trades that served the city downtown.
- Like the 700 block of Sansom Street, these buildings are rapidly shifting to small apartments, restaurants and other functions. Further, these buildings, like the Sansom Street buildings are all zoned CMX-5 so that designation will both undercut the obvious intention of city planning to create density along transit routes and be a taking of significant economic value with no recompense to the owner.
- Most obviously, these buildings at the west end do not even share the widened space of the 700 block of Sansom Street, upon which the nomination places significant import.

⁷ An extensive biography is available through the University of Pennsylvania Archives:
<http://www.library.upenn.edu/collections/rbm/mss/lea/leabio.html>

Examples of uses for other purposes:

- The building at 113 S. 8th was constructed as a restaurant and SRO hotel;
- A similar use was reported for 134 S. 8th which in 1871 was auctioned as a hotel.⁸
- 104-106 S. 8th is already individually designated and was built as an office extension to the *Philadelphia Times* whose main office was next door, designed by the Wilson Brothers. The *Times* had folded in 1902 and by the 1920s, one half of the building was occupied by novelties while the other half was an early Horn & Hardart restaurant.
- The white sanitary brick façade of 108 S. 8th Street announced another restaurant – the Central, formerly the Eighth Street Restaurant.
- 110 S. 8th housed the Hospital Clothing Company, which served Pennsylvania and Jefferson Hospitals.
- 112 S. 8th Street was occupied for much of its early history by the E. C. Pennfield Company, manufacturers of medical trusses for hernia sufferers.
- The building at 114 S. 8th Street housed Seger’s Restaurant and later Ben’s Air Conditioned Lunch.

Looking at the historic uses of the block – again not researched in the nomination -- food uses filled much of the block north of Walnut Street including 113 S. 8th, the Horn & Hardart noted above, the Central Restaurant and Ben’s Air Conditioned, as well as Joe’s Café, later a taproom at 132 S. 8th Street which like another restaurant at 138 S. 8th Street both use the rear of the first floor for food services. The food services continued with the large building at the corner of 8th and Walnut (801 Walnut, 140-142 S. 8th Street, Stuckert & Sloan, 1913) which was built to house a coffee and tea business for Alex Sheppard & Sons. Converted to apartments in 2011 with a coffee shop / café in the first floor, it, like so many other buildings in the vicinity, no longer is part of the jewelry trades.⁹ At present “Craftsman’s Row” (the former Pennfield Truss Co, building) at 112 S. 8th, 132 S. 8th, 138 S. 8th and 801 Sansom Street are all food operations.

Like the buildings of the 700 block of Sansom Street, the upper floors of the S. 8th Street buildings are shifting away from jewelry trades toward housing. Apartments fill the upper levels of 112 S. 8th, 113 S. 8th, 136 S. 8th, 138 S. 8th as well as the entire upper floors of 122 S. 8th and 142 S. 8th.

Obviously too, the buildings on 7th Street, 8th Street and the 800 block of Sansom Street are not adjacent to or impacted by the widened and moved Sansom Street block.

⁸ *Philadelphia Gazette* 3, 22 (June 2, 1871) p. 175.

⁹ Built in 1914 as a coffee and tea factory for the Alexander Sheppard & Sons company (who later sold to Horn & Hardart’s), the property ultimately became a part of the jewelry area. For the next 80 years, 801 Walnut became home to numerous jewelers, none being more successful than Leo Robbins Jewelers, which occupied the building through 2010. Pearl Properties converted the Property to luxury apartments and activated the ground floor space with an international café/restaurant in 2011. See: <https://pearl-properties.com/portfolio/801-walnut/>

Conclusion:

Notwithstanding the fact that, as laid out in extensive detail above, there is no valid justification or reason to designate the so-called Jewelers Row district as historic; given the information presented above, there is even *less* justification to include properties beyond the 700 block of Sansom Street within the proposed district. This is not intended to in any way suggest that the properties along the 700 block of Sansom Street, as a whole, come close to meeting the threshold criteria for historic designation.