

2313 Green Street continuance request from neighbor.
Applicant has agreed to request.



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June 4, 2024

Via Email Only jon.farnham@phila.gov

Jon Farnham, Executive Director
Philadelphia Historical Commission
Philadelphia, PA 19107

RE: 2313 Green Street-Request for Continuance of the Historical Commission's Hearing Scheduled for June 14, 2024.

Dear Jon:

As you know, I represent Thomas A. Leonard, III Esquire and his wife Kathleen, who reside at 2315 Green Street, which is the property immediately abutting the subject property 2313 Green Street to the west, which has a hearing before the Historical Commission (Commission) scheduled for June 14, 2024. We are in the process of reviewing revised proposals for this matter, which were officially transmitted to us in complete form on May 21-22, 2024. Due to a pre-planned and pre-paid vacation (scheduled many months ago before I had any knowledge of the upcoming Commission date) in which I am out of the country on June 11 through June 18, 2024, I must respectfully request a continuance of the June 14, 2024, Commission meeting. In support of this continuance request, please take notice of the following:

- 1) Revised proposals have been forwarded to us by the applicant (sent on May 21-22, 2024), and it is possible that one of the revised proposals might result in an agreement among the neighbors.
- 2) The Registered Community Organization (RCO), the Spring Garden Civic Association, has informed me that they will be asking for additional time to consider the revised proposals as well (and are joining in with my request).
- 3) I am the sole attorney at my firm which specializes in Historical Commission matters, and this matter will be extremely difficult to refer to a different attorney within my firm.
- 4) Our preservation expert, George Thomas, will need additional time to prepare a revised report should the revised proposals not result in an agreement.
- 5) Pursuant to Section 14-1005(6)(a)(.3) of the Historic Preservation Ordinance, the Commission has authority to postpone a ruling on a Commission matter for up to six months. In light of the very recent revisions, we feel a continuance of the hearing is not only warranted, but necessary.



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We certainly appreciate the revisions offered by the applicant, and we do not recklessly make this request-this was an unavoidable schedule conflict. It is possible, if not likely, that the additional time will result in an agreement. Should we be forced to move forward with the hearing on June 14, 2024, a possible agreement will be foreclosed.

Pursuant to your Rules and Regulations, Rule 5.16, we agree that the Commission maintains jurisdiction of the property during the pendency of these proceedings, and we agree that permit applications for the property are not subject to the 90-day limit for permit review during the pendency of these proceedings.

Please advise if this request will be granted. Thank you for your consideration of this matter.

Sincerely,

ZARWIN, BAUM, DEVITO, KAPLAN
SCHAER, & TODDY, P.C.

By: /s/ Richard C. Demarco
Richard C. Demarco, Esquire

cc: Office of Councilman Jeffery Young
Spring Garden Civic Association
Rachel Pritzker, Esquire
Allyson Mehley
LO Design