

OWNER COMMENT RECEIVED
FOR WASHINGTON SQUARE WEST
HISTORIC DISTRICT

Proposed Washington square west historic district

Carl Lysaght <cly8419@gmail.com>

Sat 3/23/2024 1:51 PM

To:preservation <preservation@Phila.gov>

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Per the letter I received today, please update me by email about this proposed historic district. You can send updates to this email. I own 1026 Pine St #7, which is within the district.

I also want to lodge my opposition to this district. The last thing I need is you being a pain in the ass when I want to replace a window.

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Washington Square West Historic Nomination Updates

Barbara Arvanitis <barbara.arvanitis@gmail.com>

Sun 3/24/2024 11:36 AM

To:preservation <preservation@Phila.gov>

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Dear Mr. Farnham,

I am an owner of a historic property in Washington Square West - 216 South Jessup Street, and am requesting to be placed on the list for email updates regarding the nomination of the district.

I am thrilled about the nomination and look forward to your email updates.

Thank you,

Barbara Arvanitis

Please remove my property from the proposed designation

francine sandrow <fransandrow@hotmail.com>

Sat 3/30/2024 11:49 AM

To: preservation <preservation@Phila.gov>; Kevin Hoekzema@yahoo.com <kevinhoekzema@yahoo.com>

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To whom it may concern,

Please do not consider 825-27 Lombard Street as part of the upcoming discussion in the nomination for designation in historic districts. I will be attending every meeting to fight this designation, and do not intend to allow it to be included in district. It is on the outer boundary and there is no reason it cannot be excluded.

If you have any questions, please call me at 215-694-7775. I have had horrible experiences with the historic society and they are a blight on homeowner latitude.

I expect to hear from you regarding removal of my property from the zone as soon as possible.

Sincerely,
Francine Sandrow
Kevin Hoekzema

Jaki <jaki@jakiashford.com>
To: Jaki <jaki@jakiashford.com>

Thu, Apr 4, 2024 at 3:01 PM

Jonathan E. Farnham, Ph.D
The Philadelphia Historical Commission
1515 Arch Street, 13th Floor
Philadelphia 19102
215-686-7660

Re: Proposal of Washington Square West Historical District

April 3, 2024

Dear Dr. Farnham,

I have owned my properties at 261 S.9th & Street 226 S.Schell Street since 1978 and know that this proposal to create a historic district is of absolutely no benefit to property owners.

This will only have a negative impact on property owners by imposing more bureaucratic encumbrances.

The list of what will require agency approval is ridiculously long.

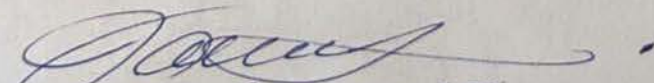
And this will also create an additional burden for people wanting to sell their property because past experience proves that these restrictions are only seen as negatives to potential buyers.

The vast majority of the properties in our area have no historical significance whatsoever.

And those that have some historical value have already been recorded into the National Register of Historic Places and have sign posts and plaques on or in front of the property informing the public of their historical relevance.

Washington Square West is already a thriving neighborhood and this initiative will only create a hardship for property owners with nothing to be gained by them.

I am completely opposed to this proposal.


208.954.7948

Washington Square West Historic District

Josh Angotti <angottijosh@gmail.com>

Sat 4/20/2024 7:38 AM

To:preservation <preservation@Phila.gov>

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Hello,

I received a letter regarding Washington Square West and its nomination for Historic District status. I own 333-35 S 13th Street, which is a small triplex within the proposed historic district and I'm very concerned about the added maintenance and upkeep costs associated with historic district designation. I purchased the property in 2014 and have made many financial sacrifices to upgrade and improve the appearance of the building; however historic designation will make future improvements less affordable and will absolutely impact my ability to maintain my current upkeep schedule, and there are others who feel similarly.

Is there any opportunity for home/building owners to reject this proposal? If so, what is the process for doing so? Thank you.

Josh Angotti

AngottiJosh@gmail.com

571.332.0985

Proposed Washington Square West Historic District

Frazar Thomas <frazar.thomas@gmail.com>

Fri 4/19/2024 3:03 PM

To:preservation <preservation@Phila.gov>

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Hello, my name is Frazar Thomas, and I own a home within the proposed boundaries of the new historic district for Washington Square West. I'm writing to register my opposition to the project. What makes this neighborhood so great is that it is dynamic and affordable, and I've been glad to see all the new housing go up in the area lately. Adding a new bureaucratic hurdle to new housing will only force out the young and lower income people that make this neighborhood great. Since both of the meetings are on weekday mornings, I will probably not be able to attend because of work, so I hope that by writing you I can at least give you some sense that there are people in the proposed district who are against this plan.

Thanks very much for your time,
Frazar Thomas

I Oppose the Washington Square West Historic District

Todd Pitock <todd.pitock@gmail.com>

Mon 5/13/2024 7:30 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>; preservation <preservation@Phila.gov>; president@washwestcivic.org
<president@washwestcivic.org>

Cc: Info@washwestcivic.org <Info@washwestcivic.org>

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Dear PHC, Councilmember Squilla, and Washington Square West Civic Association,

I am writing to express my opposition to the proposed historic district in Washington Square West.

It will make home repairs more complicated, expensive and time intensive. It will also raise rents and home prices by restricting the supply of new housing.

I implore you to instead support individual designation to achieve a pragmatic balance between preservation and development.

Todd Pitock

www.toddpitock.com
todd@toddpitock.com
610-715-9540 (mobile)
Skype: toddpitock
LinkedIn: toddpitock

Fw: Historic Designation

preservation <preservation@Phila.gov>

Wed 5/15/2024 7:26 AM

To:Laura Dipasquale <Laura.Dipasquale@Phila.gov>

Cc:Jon Farnham <Jon.Farnham@phila.gov>

From: Mark Squilla <Mark.Squilla@Phila.gov>

Sent: Tuesday, May 14, 2024 7:32 PM

To: Eleanor Wilner <pophys@aol.com>

Cc: WSWCA President <president@washwestcivic.org>; preservation <preservation@Phila.gov>; Anne Kelly <Anne.Kelly@phila.gov>

Subject: RE: Historic Designation

Eleanor

I have copied Preservation to share you input and concern on this proposal.

Sincerely,

Mark

Councilmember Mark Squilla

1st District City Council

City of Philadelphia

332 City Hall

Philadelphia, PA 19107

p. 215-686-3458

f. 215-686-1931

e. Mark.Squilla@Phila.Gov

From: Eleanor Wilner <pophys@aol.com>

Sent: Tuesday, May 14, 2024 11:43 AM

To: Mark Squilla <Mark.Squilla@Phila.gov>

Subject: Historic Designation

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Dear Councilman Squilla,

We have owned a home in Washington Square West (and been registered Democrats) for nearly fifty years. We have recently been notified by the Philadelphia Historical Commission that they are proposing a Historical Designation of Washington Square West. We are strongly opposed to this proposal for a whole variety of reasons, foremost of which is the incredible diversity of this area in every aspect, historically, socially, commercially, economically. We are not, and do not wish to be, Society Hill. We urge you to use your office to make sure that this proposal does not come to pass. Surely the city can make sure that demolitions get PHC approval without a designation that would not only destroy much of the uniqueness of the area, but would undoubtedly cause financial hardship for some of our neighbors.

Thank you for your attention to this matter.

Respectfully,

Robert Weinberg and Eleanor Willner

324 S 12th Street



Stradley Ronon Stevens & Young, LLP

2005 Market St #2600

Philadelphia, PA 19103

www.stradley.com

Kevin R. Boyle

Co-Chairman

kboyle@stradley.com

215.564.8708

May 15, 2024

VIA ELECTRONIC MAIL

Committee on Historic Designation
1515 Arch Street
13th Floor
Philadelphia, PA 19102
preservation@phila.gov

Philadelphia Historical Commission
1515 Arch Street
13th Floor
Philadelphia, PA 19102
preservation@phila.gov

RE: **Classification of (i) 1230 Lombard Street (OPA 885438620), and (ii) 1232-1234 Lombard Street (OPA 885438840) (collectively, the “Property”) in the prospective Washington Square West Historic District**

Ladies and Gentlemen:

I am writing to you on behalf of Archdiocese of Philadelphia. The purpose of this letter is to advise you that the Archdiocese of Philadelphia and its related parishes and organizations (collectively, the “Archdiocese”) strongly oppose the establishment of the above referenced district to the extent that it includes any real property owned or operated by them. While the Archdiocese supports the concept of historic preservation, it opposes all designation of its property as historic landmarks whether through individual designation or through inclusion in a historic district. The reasons for the objections, include, but are not limited to, the unconstitutional infringement upon the rights of the Archdiocese to freedom of religion and various property rights as guaranteed by the United States Constitution and the Constitution of the Commonwealth of Pennsylvania.

Within the City of Philadelphia, the Archdiocese already bears a burden with respect to historic preservation, given the significant number of properties that have some form of historic

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May 15, 2024

Page 2

designation, and the creation of the above district only increases the burden. Indeed, several former parish sites within the proposed district are already designated and have been, according to the nomination inventory, since 1961 and 1984, as applicable.

While the goals of historic preservation are laudable, operations of property owners, particularly non-profit facilities such as those owned by the Archdiocese, are constantly confronted with increased operating costs and decreasing revenues, especially when considering the age and type of properties involved. The additional financial constraints, delays and other problems created by owning property subjected to the Philadelphia Historic Preservation Ordinance have in the past interfered with the religious and spiritual goals of the Archdiocese.

In this instance, the Property consists of a modern, surface parking lot, and the Archdiocese does not believe that the goals of historic preservation are served by classifying this type of property as "contributing." While the Archdiocese opposes the creation of the historic district in general, it respectfully requests that in any final creation of the Washington Square West Historic District that the Property be reclassified as non-contributing.

Kindly keep me advised of any subsequent developments in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Boyle", written in a cursive style.

Kevin R. Boyle

Cc (via email only):

Suzanne Hueston (shueston@archphila.org)

Phil Schneider (pschneider@archphila.org)

I Oppose the Washington Square West Historic District

Jared Sobel <jsobel9@gmail.com>

Fri 5/10/2024 11:13 AM

To:preservation <preservation@Phila.gov>;president@washwestcivic.org <president@washwestcivic.org>;Mark Squilla <Mark.Squilla@Phila.gov>

Cc:Info@washwestcivic.org <Info@washwestcivic.org>

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Dear PHC, Councilmember Squilla, and Washington Square West Civic Association,

I purchased my home in January of 2020. I have no intention of moving out of it anytime soon.

I am writing to express my opposition to the proposed historic district in Washington Square West.

It will make home repairs more complicated, expensive and time intensive. I had planned on replacing my steel windows with modern, energy-efficient and environmentally friendly windows. I cannot afford to do that with the historical regulations in place. Therefore, my windows will remain as they are and more energy will be expended on HVAC.

I implore you to instead support individual designation to achieve a pragmatic balance between preservation and development. If a home is historic, it should be designated. My home is not historic; it is just a random home on a small side street of Philly.

I just want to maintain it the best I can afford without people telling me what, when, where, and how I can or cannot do what I want to my personal property.

If given historic designation, I will ultimately not be able to properly maintain my home and have to eventually move out. Please do not force Philadelphians like myself out of our homes. Thank you for your consideration.

Best regards,
Jared Sobel
1321 Rodman St.
Philadelphia, PA 19147

RE: Historic designation of Washington Square West

Mark Squilla <Mark.Squilla@Phila.gov>

Wed 5/15/2024 12:53 PM

To: Andrea Chenier <r.andreachenier@gmail.com>; preservation <preservation@Phila.gov>
Cc: WSWCA President <president@washwestcivic.org>

Andrea,

I have copied Preservation to alert them of this concerns.

Sincerely,

Mark

Councilmember Mark Squilla
1st District City Council
City of Philadelphia
332 City Hall
Philadelphia, PA 19107
p. 215-686-3458
f. 215-686-1931
e. Mark.Squilla@Phila.Gov

From: Andrea Chenier <r.andreachenier@gmail.com>
Sent: Wednesday, May 15, 2024 10:54 AM
To: Mark Squilla <Mark.Squilla@Phila.gov>
Subject: Historic designation of Washington Square West

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Mr. Squilla,

I wish to express my opposition to the current push to create a historic district in Washington Square West (where I live).

1.) The consequences of the proposal seem poorly considered, particularly unintended consequences. This may include increasing inequality and decreasing diversity in the area since only residents with adequate resources would be able to maintain and restore homes in a manner acceptable to the Historical Commission.

2.) The power of the Historical Commission is overly broad and my past experience (personal and in the neighborhood) is that

the Commission is extremely rigid in their interpretation of their mandate. Some years ago I experienced unprofessional (rude) behavior from one of their key staff in response to a query.

3.) The Historical Commission seemingly gives little or no consideration to other critical issues, such as energy efficiency (which in my view is more important in the long term than strict historical accuracy). In the case of their control over roofing and flashing, they might deny improved methods of preventing roof leakage in the name of historical accuracy. Their decisions lack transparency.

4.) None of the information I've received actually states which individual or which agency or institution (City Council?) approves the project or the timeline in which approval will be given or denied; another example of lack of transparency. I have also been unable to determine which individuals or organizations initiated and are so strongly promoting this change.

5.) Another level of bureaucracy will certainly not facilitate the creation of historically reasonable enhancements to individually-owned homes and businesses.

6.) With no evidence other than the apparent haste of the proposal, I suspect the designation of WSW as an entire historic district is a *fait accompli*. I further suspect the open meetings are mere window dressing to give the appearance of openness and transparency.

These points aside, I am generally in favor of historic districts, and in particular the destruction caused by developers, but I also believe the rigidity of some of these commissions - and Philadelphia's in particular - prevents flexibility and updating policies to account for changing conditions over time.

I would appreciate your knowing your position on this proposal, and your comments on my concerns.

Thank you,

Dick Brand
1224 Panama Street

PS. I appreciate the help your office provided to me when the City made a clerical record regarding my real estate taxes.

Support for the Washington Square West Historic District

Larry Bishop <larrybishop44@comcast.net>

Thu 5/16/2024 11:40 AM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I am writing to express my support for the proposed historic district in Washington Square West. Originally proposed in 2009, it's high time to recognize the significance of approximately 26 city blocks.

The district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries.

I urge the Historical Commission to approve the Washington Square West Historic District.

C. Larry Bishop
1208 Addison Wall
Philadelphia Pa 19147

Support for the Washington Square West Historic District

tobeydichter@gmail.com <tobeydichter@gmail.com>

Thu 5/16/2024 9:52 AM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

As resident of Wash West for 55 years, I urge you to approve the proposed designation of **Historic District for Washington Square West**. We live on Clinton Street, which Louis Kahn said was the only street he'd live on in Philadelphia. It and the surrounding area are quintessential olde Philadelphia and represent for generations to come the look and feel of our history.

I understand that the district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries. It is a gem worth preserving!

I urge the Historical Commission to approve the Washington Square West Historic District.

Thank you!!

Tobey Gordon Dichter
1017 Clinton Street
Philadelphia PA 19107
215 922 1633

Support for the Washington Square West Historic District

Peter Furcht <pfurcht@comcast.net>

Thu 5/16/2024 11:21 AM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I am writing to express my support for the proposed historic district in Washington Square West. Originally proposed in 2009, it's high time to recognize the significance of approximately 26 city blocks.

The district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries.

I urge the Historical Commission to approve the Washington Square West Historic District.

Peter Furcht
920 Clinton Street
Unit 2R
Phil., PA 19107

pfurcht@comcast.net

Opposition to the Proposed Washington Square West Historic District

Josh Zugergerman <j.zugergerman@gmail.com>

Sat 5/18/2024 8:21 PM

To: preservation <preservation@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>

Cc: president@washwestcivic.org <president@washwestcivic.org>; Info@washwestcivic.org <Info@washwestcivic.org>

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Dear PHC and Councilmember Squilla,

I live in Washington Square West and am writing to express my strong opposition to the proposed historic district covering the entirety of my neighborhood. While I provide more detail about my concerns below, in short it's a blanket designation in a neighborhood that is predominantly not historic, which will be burdensome, and expensive. To limit the overreach and burden, the neighborhood would be better served by individuals electing to participate on their own accord and individual selection of actual historic homes by the PHC

The PHC's March 21st letter was the first I heard that my neighborhood, and my house, would be contained in this new proposed historic district. Adding insult to injury, per the letter I would now need the PHC's approval to make changes to the exterior of my house as of March 21st, despite the fact that the historic district has not even been approved yet.

Setting that aside, my opposition to the proposed district stems from the fact that it is unnecessarily burdensome on the houses that are not in fact historic, such as mine, which was built in 1963 per the PHC's own records. In fact, the entire line of houses on Quince St. between Waverly St. and Lombard St. were all built in 1963, and face a surface level parking lot, also not a historic property. There is no reason that my home, or the many others that are not actually historic, should be subject to the PHC's oversight concerning alterations (cosmetic or otherwise) to the exterior.

As the PHC noted in its letter, "[m]ore than 26,000 properties illustrating Philadelphia's history from its earliest years to the recent past have been designated as historic and listed on the Philadelphia Register of Historic Places." It's clear that the PHC is fully capable of designating properties that warrant such designation, including many in Washington Square West. In fact, any neighbor who wishes to have their house designated as historic is free to nominate it to the PHC. But designating the entire neighborhood, including those of us that oppose having our homes designated, is both lazy and a tremendous overreach that will simply saddle the owners of non-historic homes with pointless burdens, barriers, and bureaucracy.

For those reasons I respectfully request that you reject the establishment of the Washington Square West Historic District. Thank you for your consideration.

Josh Zugergerman
409 S. Quince St.

Pause Philadelphia Historical Commission's Proposed Historic Designation

amanda mott <ammott80@hotmail.com>

Sat 5/18/2024 10:49 PM

To: mark.Squilla@philly.gov <mark.Squilla@philly.gov>

Cc: preservation <preservation@Phila.gov>

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Amanda Mott

1205 Pine Street

Philadelphia, PA 19107

Re: Philadelphia Historical Commission's Proposed Historic Designation of Washington Square West

May 18, 2024

Dear Councilmember Squilla:

I am writing to urge you to pause the proposed Philadelphia Historic Commission's Historic Designation for the Washington Square West neighborhood. I have attended a few of the virtual meetings held by the WSW Civic Association and PHC and have also read several studies on the topic and feel that further consideration is needed.

In 2026 Philadelphia will be front and center as America celebrates the nation's 250th birthday, an historic milestone worth celebrating. Yet, what kind of America do we want to celebrate: One that is still stuck in the Federal period or one that embraces the notion of democracy, innovation, and diversity?

I enjoy the history of the city and celebrate the natural layers, each generation's imprint that indicates a city that is lived in, a city that has energy, a city that has challenges, and one that invites progress while celebrating the past.

30 years ago, I chose to purchase a house in Washington Square West that had history—feeling a connection to the inhabitants that came before me was a choice. I also chose a neighborhood that was progressive. The house I have settled in had an eclectic mix of old and new. I bought from an artist whose personal touches called my name, even as I've updated a few things, I have uncovered the unique handprint of other generations that have called 1205 Pine Street home. There are signs of the boarding house c. 1900s – thick hinges where a door once hung, a letter by a boarder who writes home to Jamaica in 1908 imploring his mother to find him “a suitable Jamaican wife;” a deco metallic 1970s wallpaper uncovered here; a basement hearth from the 1850's hidden behind plaster and bricked up. The house has changed over time.

Do Philadelphia's leaders and the civic leaders, residents, and business owners in Washington Square West want a neighborhood that is stuck in 2024, a neighborhood that lacks opportunity for innovation, diversity, and vibrance? Or do we want a neighborhood that accurately portrays, the richness of a city that has a rich past, good and bad, and a place that reflects on what has gone before being ready to tell new stories, important stories yet to be written?

With the pressing challenges that every neighborhood in the city is facing from crime to climate change and future needs we have not yet realized, we need to have the freedom to hear from changemakers, architects, engineers, and artists with the ability to consider all ideas and welcome a vision that is rooted in looking forward not backward.

Is the value of this neighborhood and my home to be the date the house was built or the brick facade? Or will the value be counted in the richness of the progression over time, what it might be 30 years from now, how it might benefit the neighborhood 50 years from now?

I urge you to consider how each family's legacy left a patina on this house and also on the city and neighborhood and on the city's story and to realize nothing stands still, nor should it. My house abuts a series of newer houses to the west that were built from the foundation of a former police precinct and fire house that replaced neighboring row homes at some time between 1895 and 1920 according to maps available via the Greater Philadelphia Geo History Network pages <https://www.philageohistory.org/tiles/viewer/>. At the corner of 11th and Pine is Khan Park that was on the site of a former [The Gladstone Apartments which opened on Pine and 11th Streets in 1890](#) replacing what an 1875 map shows as a row of trinities. In the 1100 block of Waverly is Waverly community garden on the site of a carpet mill (c. 1910). My point is history is a living thing not something that should be turned to stone. Would we be better off without the park or the community garden? If a PHS designation had existed Washington Square West would have no section 8 housing, is that progress? Is the erasure of the trolley lines – as recently as a month ago I saw them cutting the electric lines that once drove those trolleys – is that progress or regress? It is simply the story of our neighborhood.

If a building is historically significant by all means let's work together to ask whether it is worth preserving, but let's do so without stifling innovation and progress and let's do so in a process that is transparent and inclusive. If the aim is to try to create a "picture box" I would argue a historical designation will not hold. Washington Square West has a storied past, for sure, yet the city's civic and zoning practices have cannibalized the neighborhood too badly to make an argument for the historic "picture box" to hold credence. So why now?

If the argument is to hold further development at bay now in order to maintain a Federalist "moment in time" kind of city, I suggest one need only look to Society Hill to find the best argument for not passing the broad historic designation. Where is the street life? Where is the vibrance? Where is the racial, ethnic, and economic diversity? Where is the innovation? In comparison Northern Liberties, Passyunk Square, and Graduate Hospital are humming with life and diversity, and are enjoying small business growth.

I have lived in Washington Square West for thirty years and have seen good and bad changes, good and bad development. But cities are living breathing places, that are about change and evolution. Are there parts of our city worth preserving and protecting, absolutely. But a blanket designation will do nothing to protect what is left of the formerly Black-owned businesses and institutions--unless there is public money and interest to follow. And a neighborhood which strangles creativity and business growth will create a stagnant streetscape.

Benjamin Franklin, I think, would have paled at the idea of an effort to hold progress back and restrict civic engagement, through a "historic" declaration with the restrictive authority of the PHC. He looked forward, innovating, renewing. Would he have balked at the idea of changing neighborhoods that planned for civic good by holding democratic principles hostage. Had such measures existed in other areas of the city we would not have The Parkway or Independence Mall.

Consider also that there are good studies that show that such a designation contributes to [further gentrification](#). This gentrification has made living in Center City increasingly prohibitive, yet it is home to many

working-class and middle-class families who have worked at creating a community, not a monument to Federalist architecture.

While we no longer have to preserve the shared privy or well that once was a mainstay of living here, why can't historic preservation be managed with shared governance and community engagement – rather than locking Washington Square West into stranglehold that will become a dull, lifeless, monument.

Again, I urge you to pause this pursuit of blanket PHS historic designation for this vibrant neighborhood. It follows a misinformed sense of history as something stagnant and merely built of bricks and mortar. If Philadelphia had done that in 1776 we'd be under British rule.

Thanks for your time and consideration,

Amanda Mott

Washington Square West Historic District

Barbara Arvanitis <barbara.arvanitis@gmail.com>

Sun 5/19/2024 8:48 AM

To:preservation <preservation@Phila.gov>

Cc:Jon Farnham <Jon.Farnham@phila.gov>;Laura Dipasquale <Laura.Dipasquale@Phila.gov>;Mark Squilla <Mark.Squilla@Phila.gov>;

Tami Sortman <tamisortman@gmail.com>;Marisa Shaaban <marisa.shaaban@gmail.com>;Katie Low <washwestkatie@gmail.com>;

Peter Coe <pjtcoe@gmail.com>;Robert Sher <rsher@rsher.com>;Deborah Sweeney <deb.sweeney@compass.com>;Philip Rakita <perakita@aol.com>

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Hello Historic Commission,

Thank you for attending and speaking at the May 14th Washington Square West Civic Association Board Meeting.

As a property owner of a contributing historic property in the Washington Square neighborhood I am 100% in favor for the Historic Commission to recommend and vote yes to make the specific boundaries indicated in the nomination as historic.

Preserving the historic fabric of the neighborhood is very important to me.

Additionally I would also like the opportunity to speak during the public comment period so please add me to the list.

Sincerely,

Barbara Arvanitis

Support for the Washington Square West Historic District

Peter Joly <pjoly1951@gmail.com>

Sun 5/19/2024 12:31 PM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I am writing to express my support for the proposed historic district in Washington Square West. Originally proposed in 2009, it's high time to recognize the significance of approximately 26 city blocks.

The district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries.

I urge the Historical Commission to approve the Washington Square West Historic District.

Peter Joly
1207 Rodman St
Phila, 19147

Sent from my iPhone

Support for the Washington Square West Historic District

Dichter, Mark S. <mark.dichter@morganlewis.com>

Sun 5/19/2024 11:07 PM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I am writing to express my support for the proposed historic district in Washington Square West. Originally proposed in 2009, it's high time to recognize the significance of approximately 26 city blocks.

My wife and I have lived in the proposed Washington Square West historic district for almost 55 years, first at 250 S. Quince Street from August 1969 until we moved in 1976 to our current address at 1017 Clinton Street where we raised our two daughters. Over the years we have been here many of the buildings have been caringly maintained or restored. Unfortunately however because of the lack of historic designation we have also seen many historically significant buildings demolished because of the lack of historic district designation.

The district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries. I worked with members of the board of the Washington Square West Civic Association and the Preservation Alliance to prepare this application. During the process we held several community meetings and responded fully to all of the concerns raised by our neighbors. The only adverse impact of historic district designation might be on those developers who wish to demolish buildings within the proposed district and adversely impact the character of our historic neighborhood

I urge the Historical Commission to approve the Washington Square West Historic District.

Mark S. Dichter

1017 Clinton Street

Opposition to the Proposed Washington Square West Historic District

Arshad, Fareeha <Fareeha.Arshad@Glenmede.com>

Mon 5/20/2024 9:14 AM

To: preservation <preservation@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>

Cc: president@washwestcivic.org <president@washwestcivic.org>; Info@washwestcivic.org <Info@washwestcivic.org>; Fareeha Arshad <fari324@comcast.net>

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Dear PHC and Councilmember Squilla,

I am a resident and homeowner in Washington Square West. I am writing to express my strong opposition to the proposed historic district covering the entirety of my neighborhood. While I provide more detail to my concerns below, in short it's a blanket designation in a neighborhood that is predominantly not historic, which will be burdensome, and expensive. To limit the overreach and burden, the neighborhood would be better served by individuals electing to participate on their own accord and individual selection of actual historic homes by the PHC

The PHC's March 21st letter was the first I heard that my neighborhood, and my house, would be contained in this new proposed historic district. Adding insult to injury, per the letter I would now need the PHC's approval to make changes to the exterior of my house as of March 21st, despite the fact that the historic district has not even been approved yet.

Setting that aside, my opposition to the proposed district stems from the fact that it is unnecessarily burdensome on the houses that are not in fact historic, such as mine, which was built in 1963 per the PHC's own records. In fact, the entire line of houses on Quince St. between Waverly St. and Lombard St. were all built in 1963, and face a surface level parking lot, also not a historic property. There is no reason that my home, or the many others that are not actually historic, should be subject to the PHC's oversight concerning alterations (cosmetic or otherwise) to the exterior.

As the PHC noted in its letter, "[m]ore than 26,000 properties illustrating Philadelphia's history from its earliest years to the recent past have been designated as historic and listed on the Philadelphia Register of Historic Places." It's clear that the PHC is fully capable of designating properties that warrant such designation, including many in Washington Square West. In fact, any neighbor who wishes to have their house designated as historic is free to nominate it to the PHC. But designating the entire neighborhood, including those of us that oppose having our homes designated, is both lazy and a tremendous overreach that will simply saddle the owners of non-historic homes with pointless burdens, barriers, and bureaucracy.

For those reasons I respectfully request that you reject the establishment of the Washington Square West Historic District. Thank you for your consideration.

Fareeha Arshad
417 S Quince Street
Philadelphia, PA 19147
412-952-6660

Fareeha N. Arshad, CFA, CFP® She/her/hers
Relationship Manager, Portfolio Management | Managing Director

fareeha.arshad@glenmede.com

O: 215-419-6152 | **M:** 215-796-7041 | **F:** 267-675-5353

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Support for the Washington Square West Historic District

Jude Tuma <jude@geminuscapital.com>

Mon 5/20/2024 10:15 AM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I am writing to express my support for the proposed historic district in Washington Square West. Originally proposed in 2009, it's high time to recognize the significance of approximately 26 city blocks.

The district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries.

I urge the Historical Commission to approve the Washington Square West Historic District.

Jude Tuma

314 S 10 Street

Philadelphia, PA 19107



May 20, 2024

Via Email (Jon.Farnham@phila.gov; preservation@phila.gov)

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission
1515 Arch Street
Philadelphia, PA 19102

RE: 400 S. 9th Street, Philadelphia, PA 19147
Proposed Washington Square West Historic District

Dear Dr. Farnham:

I am writing as counsel for University City Housing Company (“UCH”) in relation to the proposed Washington Square West Historic District (“District”).

UCH objects to the creation of the District and to the inclusion of 400 S. 9th Street in the District as a “Contributing” building.

The size of the proposed District is overly expansive, encompassing approximately 26 city blocks. While there are undoubtedly individual buildings within that defined area that meet the designation criteria, the vast majority of buildings are rowhouses that are not architecturally unique or historically significant.

A “Contributing” building is a building “within a district that reflects the historical or architectural character of the district as defined in the Commission’s designation.” In the nomination documents the Philadelphia Historical Commission (“PHC”) defines the character of the District as reflective of Greek Revival style. 400 S. 9th Street is a rowhouse near the outer boundary of the proposed District. Other than the use of marble, there are no other notable Greek Revival elements. Further, the building itself is not historically significant.

With over 50% of the properties in the proposed District already on the historic register, PHC’s goal of preserving the streetscape and the history of the District has already been achieved. Designating the entire neighborhood creates a disincentive for owners across the District to perform maintenance and stifles development in general.

Thank you for your attention to this matter. Please copy me on any future correspondence regarding the proposed Washington Square West Historic District.



Very truly yours,

UNIVERSITY CITY HOUSING COMPANY

Melissa A. Simola
In-House Counsel
1630 Locust Street, 1st Fl.
Philadelphia, PA 19103
215-253-7052
msimola@uchweb.com

Washington Square West Historic District

Drew Moyer <drewalanmoyer@gmail.com>

Mon 5/20/2024 3:02 PM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I'm writing in support of designating Washington Square West as a Historic District. I also write with great thanks and appreciation for the work that the Commission, the Preservation Alliance, the Washington Square West Civic Association (WWCA), consultants and other parties have put into this effort over a period of years. I serve on the Board of WWCA.

When I ran for election to the Board, I made clear my support and intentionality regarding the application for historic designation for the neighborhood. That is also true for numerous other members of the Board and evidenced by the Board's authorization to spend thousands of dollars on the application process. A handful of vocal opponents currently do not negate the majority of voices in support of the designation over many years. Perhaps the absence of a major historical building demolition in the last couple of years has quieted the emotions on this topic for some. They will surely be re-awakened should another landmark in our neighborhood be destroyed.

I've lived in Washington Square West for 14 years, the first 10 of which were in a non-historic home built in 1970. For the last 4 years I've lived in a historic home designated as such by the Historical Commission and built in 1837. In renovating each square foot of both the interior and the exterior of the home, I found no difficulty whatsoever in working with the Commission. In fact, I was surprised by the level of latitude available with renovations and repairs of a historic property. As I have watched a few neighboring historic homes be converted into condos or apartments, all within PHC guidelines and approvals, I sometimes wish for tighter restrictions to maintain the full character, beauty, and architectural significance of the properties.

In our community, there are frequent references to the "fabric of the neighborhood," particularly when it relates to development. Questions such as, "Is it still a Gayborhood?" and "Should there be a new arena?" are top of mind. ***There is no greater contributing factor to the fabric of our neighborhood than its historic properties.***

Thank you for your careful review and consideration of the application. I urge you to approve the designation of Washington Square West as a Historic District.

Sincerely,

Drew Moyer
314 S. 10th Street (a/k/a 1000 Clinton St.)
Philadelphia, PA 19107

Philadelphia Historical Commission

Cris Constantinescu <c.s.constantinescu@gmail.com>

Mon 5/20/2024 8:40 PM

To:preservation <preservation@Phila.gov>;ig15@le.ac.uk <ig15@le.ac.uk>

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Dear Commission, Dear Dr Farnham

We would like to be involved in the efforts to preserve Philadelphia's heritage and to have our property included in the Washington Square West Historic District. We would like to receive updates by e-mail. Please let us know if you need further information from us.

Many thanks and best regards

Cris Constantinescu, MD and Irene Gottlob, MD
427 S Camac Street
Philadelphia PA 19147

c.s.constantinescu@gmail.com and ig15@le.ac.uk

updates

Mary Grant <marygrant48@gmail.com>

Fri 3/29/2024 5:31 PM

To:preservation <preservation@Phila.gov>

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Hello from Midtown Village.

I have just received notification of the possible designation of our neighborhood as an Historic District. I am enthusiastic about this idea, and I would like to receive updates from your office. My email is

marygrant48@gmail.com.

Thank you,

Mary Grant

1111 Locust Street, #5G

Philadelphia 19107

Re: Support for the Washington Square West Historic District

Deborah Kahn <debkahn09@gmail.com>

Tue 5/21/2024 11:42 AM

To: preservation <preservation@Phila.gov>

Cc: Tobey Dichter <tobeydichter@gmail.com>

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Dear Commissioners,

I moved with my family to Washington Square West from San Antonio, Texas in 2021.

When choosing a Philadelphia home my husband and I dreamed of the large stately 19th century homes of the city. We looked at new construction, too, but found it dull, cookie cutter, comfortable but lacking the historic charm we associate with Center City Philadelphia.

We ask that you consider the immense value that the historic homes and buildings provide to our community. There needs to be thought and care in maintaining the treasured aspects of our city.

I support the proposal to designate a Historical District for Washington Square West.

Sincerely,

Deborah Kahn
1008 Clinton Street
Philadelphia PA 19107
267-250-9292

On Thu, May 16, 2024 at 9:51 AM <tobeydichter@gmail.com> wrote:

Dear Commissioners,

As resident of Wash West for 55 years, I urge you to approve the proposed designation of **Historic District for Washington Square West**. We live on Clinton Street, which Louis Kahn said was the only street he'd live on in Philadelphia. It and the surrounding area are quintessential olde Philadelphia and represent for generations to come the look and feel of our history.

I understand that the district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries. It is a gem worth preserving!

I urge the Historical Commission to approve the Washington Square West Historic District.

Thank you!!

Tobey Gordon Dichter

[1017 Clinton Street](#)

[Philadelphia PA 19107](#)

215 922 1633

Philadelphia Historic Commission
1515 Arch St.
13th Floor
Philadelphia, PA 19102

May 20, 2024

Re: Proposed Washington Square West Historic District

Dear Commissioners,

My husband Greg Hardes and I are homeowners living with our children at 1119 Lombard Street. We understand that the Commission is considering the designation of a large portion of the Washington Square West neighborhood as a Historic District. We have reviewed the nomination, have serious concerns about it, and oppose its designation.

The section of Philadelphia Code that governs historic designation requires that a district be a geographically defined area with a significant concentration of historic buildings that are linked by past events, a shared plan, or similar physical development. The checked criteria in the Washington Square West nomination refer to “an era characterized by a distinctive architectural style,” innovative design elements, or that “exemplifies the cultural, political, economic, social or historical heritage of the community.” We do not believe the proposed district, and our inclusion within it, meet these requirements.

The time period covered by the nomination is hardly “an era characterized by a distinctive architectural style.” The proposed district includes almost 1,500 properties, and a period of 1740 to the 1980s – almost 250 years! It includes properties of many eras and disparate historic, political, and social events. If this nomination meets the Philadelphia Code requirements, a historic district designation could just as easily be proposed for the footprint of our entire city. There may be smaller portions of our neighborhood that reflect specific social histories, such as the LGBTQ+ community, but they should be carefully identified and demarcated.

Until we saw the nomination, we believed our house was built in the 1960s, as it exactly matches other houses in the vicinity that were built in the 1960s. One of the reasons we chose to buy this home was because it was not historically certified, and we understand how financially burdensome such a certification can be on a homeowner. We now learn that it was built in the 1830s, but it has been significantly renovated and altered over almost 200 years, including the addition of a floor. It is classified as “contributing,” and there are almost no original elements. If it is to be included, the only portion of it designated as “contributing” should be the front façade up to the cornice line. The rest should be excluded.

Thank you,



Andrea Korb and Greg Hardes

Support for the Washington Square West Historic District

Robert Tunick <bobtunick@gmail.com>

Tue 5/21/2024 12:51 PM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

I am writing to express my support for the proposed historic district in Washington Square West. Originally proposed in 2009, it's high time to recognize the significance of approximately 26 city blocks.

The district satisfies Criteria for Designation A, C, E, F, I, and J, which include social, architectural, cultural, and archaeological histories. The Washington Square West Historic District illustrates the development of Philadelphia's residential and commercial core over more than two centuries.

I hope that if Wash West becomes an historic district, we will never have a repeat of the Jeweler's Row debacle. Toll Bros proposed to demolish several buildings along Sansom Street in Jewelers Row to construct a high-rise apartment building. Absolutely no one wanted this to happen (except for the owners of the properties, who wished to sell them), but absolutely nothing could be done to stop it. The buildings were demolished several years ago, but Toll Bros. lost interest and pulled out. We now have a vacant lot. Had the neighborhood been certified as an historic district, this disaster would not have happened. We need to protect what remains of Jewelers Row, plus the 700 block of Chestnut Street, plus the scores of beautiful townhouses on Spruce, Pine, Clinton, Quince, Camac, etc..

I urge the Historical Commission to approve the Washington Square West Historic District.

Robert Tunick
Pres., Portico Row Unit Owners Association
912 Spruce St.

Proposed Washington Square Historic District

volm matthew <mattvw@gmail.com>

Mon 5/20/2024 5:05 PM

To:preservation <preservation@Phila.gov>

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Dear Sirs,

I am writing to voice my support for the proposed Washington Square West Historic District. I live at 311 S. Fawn St. in a house that was built in 1875 and is located in the proposed district. Almost all of the houses on my block are already designated historic buildings, but for some reason my house and several others on the block were never designated. I would like to see our entire block protected, and so I strongly support the proposed Washington Square West Historic District.

I think historic preservation is much more meaningful and effective when it is applied to an entire neighborhood rather than piecemeal to individual properties. I hope that the unique historic character of my block and neighborhood will be preserved for many years as part of the Washington Square Historic District.

Thank you for your consideration.

Matthew Volm
311 S. Fawn St.
Philadelphia, PA

Owner of 246 s. 11th St Philadelphia PA

sashimi717 <sashimi717@gmail.com>

Wed 3/27/2024 2:21 PM

To:preservation <preservation@Phila.gov>

 1 attachments (5 MB)

20240327_141606.jpg;

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Hi my name is Min fei huang owner of 246 s. 11th Street, Philadelphia PA. I have received the letter regarding my property to be included in the historic district. My question is do I get a choice or vote on it, if I don't want to be included should I do anything. I am an investor from Harrisburg PA and this is the first time we run into this, I have called and Left couple messages and no one called back. Thank you and please contact me via email or my cell 717-503-7380.

Sincerely
Min fei huang

Sent from my Galaxy

Support for the Washington Square West Historic District

Hwittich <hwittich@gmail.com>

Tue 5/21/2024 7:25 PM

To:preservation <preservation@Phila.gov>

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Dear Commissioners,

As owners of 231 and 233 S. Jessup St., our homes already fall under the purview of the Historical Commission's Registry of Historic Places. We have lived in our home on Jessup St. for over 30 years and are very familiar with what it means to live in a historically designated home. It can take extra time and money to go thru the historical approval process, but we believe it is well spent because it helps protect what we find so amazingly special about living on our little slice of history here in Wash. West.

As recently as December 2020, we participated in the request for approval of proposed construction renovations planned for the Quince St. property that backs onto Jessup St., just across from our front doors. This review was held by the Architectural Committee of the Philadelphia Historical Commission as an opportunity for the neighbors and other interested parties to weigh in on the review of the property owner's proposed changes.

We had the opportunity to express our concerns over the need for design changes that would be more in scale with the adjacent houses and more compatible with the historic character of our special neighborhood, such as:

- the inappropriateness of some of the types of materials proposed (such as cementitious siding rather than stucco or masonry), the use of strip windows, and the configuration of other openings which we felt were incongruous with the surrounding houses;
- our concerns over the proposed shed dormer, which pitched up from the roofline, would have increased the back wall to a height out of scale with the rest of the house, making the house appear large and bulky from Jessup St.;
- our opinion that we thought the 3rd floor addition was more appropriate for a beach house at the Jersey Shore than an early nineteenth century house in our historic neighborhood.

We would not have had this opportunity to have our opinions heard if this house had not already been designated for historic preservation. There are other small streets in Wash. West that are just as charming (ok – almost as charming) as Jessup St. and the neighbors living on these streets should have as much of a right to protect what makes their neighborhood special to them as we do.

Therefore, we support moving forward with the creation of the Washington Square West Historic District.

Hillary and Mike Wittich
231 and 233 S. Jessup St.
Philadelphia, PA 19107

comments and request to speak at May 22 meeting

Lynn Landes <lynnlandes@gmail.com>

Tue 5/21/2024 4:36 PM

To: preservation <preservation@Phila.gov>

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This is my request to speak at tomorrow's 9:30 am meeting, per PHC instructions --
<https://www.smallstreetsphilly.org/CHD-5-22-2024-FAQs.pdf>

Lynn Landes, 217 S. Jessup Street, Philadelphia, PA 19107

I would also like my comments sent to the PHC Commission:

We would like to show the PHC our block (200 block of S. Jessup Street) to see for themselves the issues at hand (photos below), but in the meantime, please **pause** the historic designation process of Washington Square West by the Philadelphia Historical Commission (PHC) until property owners can meet with the PHC in a public forum to discuss this situation.

We only received official notice of this process in a March 2024 letter by the PHC, which included a warning that anything we may do to the exterior of our houses might need to be undone, if Wash West receives historical designation as the result of the approval of a committee of PHC on May 22, and the approval of the PHC on June 14. To many, this decision already appears to be a "done deal".

It should be said that many property owners support the banning of any more demolition in Washington Square West without the approval of the Philadelphia Historical Commission (PHC). In fact, some of us believe that PHC should have rights of review for the demolition of any property in Philadelphia that could be considered historic.

That said, we have serious complaints about the Philadelphia Historical Commission's (PHC) past and present behavior. For many decades, the PHC has been insensitive to the concerns and the complaints of property owners whose buildings have been "historically designated". One reason for this situation could be that the PHC is not accountable to any City Council committee, which automatically eliminates an important opportunity for public comment. Another reason is that at the PHC public meetings, public comments are restricted to "agenda items only"; which is also unfortunately true for City Council, its committees, and many of the city's departments, commissions, agencies, etc.. It should be noted that most municipal governments view restricting public comments to "agenda items only" for regular public meetings, as a violation of the First Amendment to the Constitution and the Pennsylvania Sunshine Act.

The PHC has placed large swathes of historic Philadelphia under its authority by creating historic districts. Again, we support and applaud saving our historic treasures, however it has come at an unnecessarily high cost to property owners, which has negatively affected the diversity of population, income, architecture, and personal expression. It doesn't have to be this way. We believe that we can preserve the past while living fully in the present to everyone's benefit, if we open a meaningful and ongoing dialogue with the PHC.

Currently, there has been little dialogue with most of the affected Wash West property owners since the inception of this process, which began in earnest 3 years ago. A community dialogue was and is the responsibility of the PHC. However, there was no meaningful attempt to even contact the affected property owners until March of 2024, when the decision was all-but-made. Those supporting this proposal, The Historic Preservation Alliance and Wash West Civic (who represents less than 400 members), have also not alerted all of the affected property owners. And although this was not their responsibility, per se, they are assuming the role of representing the community, which they may or may not.

An obvious indicator of public support would be for the affected properties to be given the opportunity to vote for or against this proposal. But frankly, there is no need for the effected Wash West property owners to take a vote, because property owners already have voted in a manner of speaking. If property owners wanted a historic designation, they could have applied for it for their own homes. The problem with this designation is that it is being forced onto property

owners with inadequate information on the PHC website as to what a historic designation actually means and what property owners' options are available. In fact, there appears to be no key for the designations, per the following PHC report about Washington Square West: <https://www.phila.gov/media/20240510111039/Historic-District-Wash-West-1.pdf>

It has not been helpful that misinformation has also been told to the public by the Preservation Alliance representative, Paul Steinke, who has publicly said on at least two occasions that PHC will not get involved unless a permit is required, which is incorrect. Non-designated property owners do not need a permit to paint the exterior of their buildings, however historically designated property owners do need the approval of the PHC. And that is a very big deal to many property owners.

PHC's color restrictions can have a harmful effect on individual property owners and entire neighborhoods. Many streets are very narrow and dark, as a result many property owners paint their exteriors lighter colors to brighten the area, if not lift the mood. Under current PHC policy, if property owners want to paint their homes, PHC limits the color selection to "red brick", even though in the past PHC offered a selection of "historic" colors. And if property owners want to plaster their exterior walls for structural or insulation purposes, those requests may also be denied.

PHC can and does deny adding or enlarging windows on walls that the public can see from the street or sidewalks, as well as glass inserts for doors. Many people want and need light to enhance their physical and mental health, as well as prevent mold and mildew. They should not be stuck in a historical time warp to their own detriment. There are corner buildings in Wash West that are a solid wall of brick, yet the PHC would not approve additional windows. The traditional 6-paneled door can also be altered to allow light in, but the PHC has denied those requests, as well.

Another common complaint is the high cost of new windows and other historic alterations, which has opened the PHC to criticism of encouraging gentrification and discouraging home owners who need affordable housing. It has come to our attention that affordable wood windows could be made for as little as \$200, but that PHC requirements may be keeping the price of new windows artificially high, to as much as \$4000, by requiring certain specifications that are made by only a few window companies. We would like to see the PHC involved in the establishment of one or more local window and trim makers who can manufacture these products at a reasonable price. For example, the windows could be the wood double-paned and insulated variety, but they could also be the more traditional wood true-divided windows with a wood framed storm window.

Adding to the list of complaints, it appears that only full-glass storm doors are allowed by the PHC, which do not provide effective security, while window shutters may or may not be allowed, even though they are great energy savers, particularly in the summer. Most of this information is not on the PHC website so that property owners are not informed about what their options are.

The "crown jewel" of the 200 block of S. Jessup Street is the late-Diane Fertik's house, which was redesigned in the 1930's and includes elaborate balconies, additional windows and doors, and a huge rose window. It was historically certified in the 1960's. Under current PHC's historic designation, those wonderful improvements would, most likely, not be permitted. Many other "historically designated" properties have also benefitted from past alterations that would not now be, in general, allowed for current property owners of historically designated homes.

There appears to be little accommodation by the PHC for what "looks good, works well, affordable, and is in keeping with the historic flavor" of our neighborhoods. Do we want a community where individuality, design, and artistry are completely sacrificed at the altar of historic preservation of a particular moment in time? Or should we meet together with full information and an open mind in order to achieve an agreement that will benefit our entire community?

Please allow time for a meaningful dialogue and alteration of PHC policies to allow for the benefit of all concerned.

Respectfully yours,

Lynn Landes, Founder
Philadelphia Society of Small Streets
<https://www.SmallStreetsPhilly.org>
714-204-2690
LynnLandes@gmail.com

Photos of some of PHC'S questionable decisions:

Second house from left was not allowed by the PHC to install shutters on the second floor because the owner could not produce a photo and PHC could find no evidence of shutter "stays".



Blank wall that PHC refused to allow the homeowner to add windows despite all the windows on the other side of the street for the same period house.



A non-designated front door with 4 out of 6 panels converted to windows, versus a PHC-approved front door, whose home owner requested to put 2 windows in the top two panels to bring more light into the house, but was denied by PHC.



The late-Diane Fertik's home at Irving and Quince Streets, was remodeled in the 1930's to include the rose window, French doors, balconies, and three windows on second floor of one house. None of those improvements would be allowed under current PHC policies.





Why has the PHC's historic designation not saved this house on Pine Street in Society Hill from obvious and serious decay? Where is L&I, who oversees PHC?



Why has the PHC historic designation of the 200 block of Quince Street (which is all-but-impassable) and other historically designated streets across Philadelphia not resulted in a timely restoration?

May 21, 2024

Via E-mail

Jonathan E. Farnham, Ph. D.
Executive Director
Philadelphia Historical Commission
1515 Arch Street, 13th Floor
Philadelphia, PA 19102
Jon.Farnham@phila.gov

Re: 219 S. 13th Street and 1235 Locust Street (collectively, the “Property”)
Proposed Washington Square West Historic District Inventory

Dear Dr. Farnham:

We represent Parkway Corporation (“Parkway”), the owner of the Property, located at the northeast corner of 13th and Locust Streets. We understand that the Washington Square West Civic Association and Preservation Alliance for Greater Philadelphia submitted a nomination application (the “Nomination”) for the creation of the Washington Square West Historic District (the “Proposed District”). We further understand that the Property was identified as a “contributing” property in the Proposed District’s inventory.

The Property is currently a surface parking lot. It has been such for decades. Parkway is not aware of any archaeological significance to the Property, nor does the Nomination set forth such evidence. Moreover, other than a generalized statement covering the entire Proposed District (one-half mile in area) which would be applicable to much of Philadelphia, there is no mention of any specific archeological significance in and around 13th and Locust Streets. Accordingly, we request that the Historical Commission revise the Proposed Nomination’s inventory to identify the Property as “non-contributing”.

The Nomination’s Attempt to Regulate Archeological Resources

The Nomination includes the following generalized statement about a potential for archeological resources in the Statement of Significance (page 19):

As noted above, the District includes multiple lots that have not seen redevelopment that has entailed extensive subsurface disturbance since the removal of buildings constructed before the twentieth century. Many of these are the site of dwellings or secondary buildings associated with residents of lesser means who would not have left a written record of their lives, and sub-surface remains are likely to yield important information about their lives that

cannot be recovered by other means. The District also includes the sites of institutions associated with the District's Black history. Particularly notable among these are the site of St. Thomas at 203-209 S. 12th Street.

Other than the statement regarding sites of institutions associated with the District's Black History, this statement could be made about almost anywhere in Center City Philadelphia and adjacent neighborhoods. There is nothing specific in the Statement of Significance that links these particular properties together as a district for archeological purposes.

The Property's Proposed Inventory Designation Conflicts with the Statement of Significance.

For a property to be "contributing" to a historic district, its inventory designation must demonstrate how it "reflects the historical or architectural character of the district, as defined in the Historical Commission's designation." *See* Phila. Code § 14-203(78). Here, the proposed Inventory claims that Property should be contributing for reasons other than is stated in the Nomination's Statement of Significance. That is beyond the power of the Historical Commission.

Here, as stated above, the Nomination does not contain any information supporting the assertion that the Property is of archaeological significance – let alone falling within the required regulatory boundaries of a historic district. The Nomination simply proclaims that there is "archaeological potential" at the site because a portion of the Property may have housed the College of Physicians and the central branch of the Free Library at some point in time. The Nomination provides no further information about either institution or their combined significance to the Proposed District; even further, the Nomination's Statement of Significance contains no mention of the College of Physicians or the Free Library. Given the above, the Nomination provides no evidence that the Property reflects the character of the Proposed District as set forth in the statement of significance. As such, the Property fails to meet the definition of "contributing" and more accurately should be labeled as "non-contributing". Accordingly, we ask that the Historical Commission list the Property as "non-contributing".

Jonathan E. Farnham, Ph. D.
May 21, 2024
Page 3

Thank you for your consideration, and please let us know if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Matthew N. McClure', with a stylized flourish extending to the right.

Matthew N. McClure

MNM/mpg

I SUPPORT THE WASHINGTON SQUARE WEST HISTORIC DISTRICT

BARBARA SIMON <barbara.simon2@comcast.net>

Wed 5/22/2024 10:47 AM

To: Mark Squilla <Mark.Squilla@Phila.gov>; preservation <preservation@Phila.gov>; president@washwestcivic.org <president@washwestcivic.org>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Dear Councilman Squill, WSWCA, and PHC

I am writing to express my strong support **in favor** of the Washington Square West Historic District.

I have lived in Washington Square West for 32 years. I chose to live here because of the unique charm and history of this neighborhood.

I have seen the direct harm of bad development, with creation of modern "box" designs which disrupt the beauty and architectural continuity of blocks in our neighborhood.

I reject the premise that new development makes our neighborhood more affordable, and that somehow this historic designation would contribute to inequities and lack of affordability. For one example, on the block behind my home (Addison Walkway) an open yard with a tree was just developed into 2 vertical houses which sold for over 1.3 million and 1.4 million dollars respectively. These are single resident homes!

In preparation for our nation's semiquincentennial celebration, I am pained by the lack of preservation of our history. Why is our city so walkable, so beautiful, why do tourists roam our streets? We need more protections in place to help us balance preservation. This designation is the appropriate step to take before it is too late.

I am 100% in support of Washington Square West as a historic district.

Sincerely,
Barbara Simon
1208 Waverly Walk
19107

Wash West Historical District

Kevin Hoelzema <kevinhoelzema@yahoo.com>

Thu 6/6/2024 7:16 PM

To: preservation <preservation@Phila.gov>

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Hi,

I am emailing you about the proposed, or should I say steamrolled historical designation in Wash. West. I have lived in my home for 20 years. When we purchased it we purposely verified that it was not historic, not because we did not want to maintain its beauty and history, but because we did not want the financial and bureaucratic burden. Twenty years later I receive a letter in the mail deeming my home as historic, telling me that I have to get approval to make changes too or maintain my home. I do not have any say in this? People that probably do not even live in the area, probably do not have historic homes can tell me what I can and cannot do with my home without even notifying me, hearing my opinion. Sounds like the rule that our forefathers fought so valiantly against.

I get what you are trying to do, but the way you are doing it is not right. If you want to persevere building then either convince people to voluntarily designate their home to be historic or have the city/commission purchase these homes, designate them as historic and then sell them to people with the knowledge of what they are getting into. It is not right to force someone that has been living in a home all their lives to now take on the burden of increased maintenance. cost and bureaucracy. I also don't think that it is right to lock a community in time. We need to progress. The variation in architecture is what gives our city charm. You are holding the city back from growing and progressing. If my home was under your rule before I would not have the beautiful paver side walk. The nice planters outside with beautiful plants.

As I understand it, the Sunshine Act states that you have to notify the public of such changes and have public meetings that the public can attend. Where were those meetings? Those meetings should have take place way before any letter stating that my home is now under the oversight of the historic commission.

My home has 26 windows which we would like to replace. Quotes to do this are \$80-90K. To purchase windows that your commission approves of will be well over \$100K. If I want to re-paint my home I have to get approval for what color I can paint it? I want nothing to with this.

There are higher priorities in this city, schools, public safety, tax reduction.

Sincerely,

Kevin Hoelzema
825 Lombard

Washington Square West Historic District

Josh Angotti <angottijosh@gmail.com>

Fri 6/7/2024 4:28 PM

To:preservation <preservation@Phila.gov>

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Hello,

I previously registered an objection to designating Washington Square West as a Historic District, and I'd like to repeat my objection. I also spoke with Laura Dipasquale and verbally registered my objection. Neither the phone call I had with Laura nor the materials sent to me have clearly indicated the benefits of designating a neighborhood as "historic". I was told that there's no financial benefits to the property owner, nor is there a financial benefit to the city. Therefore this seems like a solution in search of a problem. Below is the original objection I sent via email.

I received a letter regarding Washington Square West and its nomination for Historic District status. I own 333-35 S 13th Street, which is a small triplex within the proposed historic district and I'm very concerned about the added maintenance and upkeep costs associated with historic district designation. I purchased the property in 2014 and have made many financial sacrifices to upgrade and improve the appearance of the building; however historic designation will make future improvements less affordable and will absolutely impact my ability to maintain my current upkeep schedule, and there are others who feel similarly.

Josh Angotti

AngottiJosh@gmail.com

571.332.0985

Proposed Washington Square West Historic District

Jay Ifert <jay.ifert@gmail.com>

Fri 6/7/2024 4:14 PM

To:preservation <preservation@Phila.gov>

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Commission,

I am an affected property owner (419 S 13th St) and writing to express my **opposition** to the proposed Washington Square West historic district.

I believe historic preservation is important, however doing so without the buy-in of owners is problematic. Forcing homeowners to adhere to historic preservation that they did not request is a burden. If individual property owners wish to apply for historic designation, by all means they should. As identified in the proposal, over half of the homes within the designation area already have a historic designation - why force the parking lots and homes with little historic value to also adhere to the designation?

I attended the Zoom meeting regarding the nomination approval for the designation and it is unfortunate that the Historic Commission seems to only allow individuals to voice their opinions, but does not take them into account to their decisions. Slides recommending approval were already prepared prior to the public's comments. It's extremely disappointing that the designation process does not involve homeowners as a primary stakeholder in the decision. Historic associations make the majority of nominations and can't contain their excitement when property owners are not involved. Why is it not property owners being the driving voice behind the historic designation when they are the most affected by it?

With respect,
Jay Ifert

Re: Most property owners did not know about the hearing on February 13th, I ask for a re-hearing that is better advertised Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

preservation <preservation@Phila.gov>

Wed 4/17/2024 3:38 PM

To: Max R <maxercize@hotmail.com>; Mark Squilla <Mark.Squilla@Phila.gov>; pjtcocoe@gmail.com <pjtcocoe@gmail.com>; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org <info@washwestcivic.org>; info@washwestcivic.com <info@washwestcivic.com>

Councilman Squilla, thank you for connecting us.

Mr. Richardson,

The Historical Commission and its advisory Committee on Historic Designation meetings, which are the first official meetings to be held on the matter of the Washington Square West Historic District designation, are open to the public. While the Historical Commission does not require owner consent in order to designate a property or historic district, all owners and members of the public wishing to speak an agenda item will be invited to do so, and any written testimony emailed to the Commission by noon the day before the meeting at preservation@phila.gov will be directed to the Commission and Committee members. The Washington Square West Historic District is scheduled to be reviewed by the advisory Committee on Historic Designation meeting via Zoom at 9:30am on Wednesday, May 22nd, and the Historical Commission meeting will be held via Zoom at 9:00am on Friday, June 14th.

Previous meetings held by the Washington Square West Civic Association are separate from the Historical Commission's designation process.

Please let us know if you would like to be added to our email distribution list, or if you have any questions.

Thanks,

Laura

Laura DiPasquale
Historic Preservation Planner Supervisor
Philadelphia Historical Commission
preservation@phila.gov

From: Max R <maxercize@hotmail.com>

Sent: Wednesday, April 17, 2024 1:38 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>; pjtcocoe@gmail.com <pjtcocoe@gmail.com>; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org <info@washwestcivic.org>; info@washwestcivic.com <info@washwestcivic.com>; preservation <preservation@Phila.gov>

Subject: Re: Most property owners did not know about the hearing on February 13th, I ask for a re-hearing that is better advertised Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

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Also because of the way the joists are pocketed in these joisted masonry buildings, fires can spread relatively easily between them, and due to their not being fire cuts on the joist, when the joists give way in the middle, they take the part wall with them.

From: Max R <maxercize@hotmail.com>

Sent: Wednesday, April 17, 2024 1:33 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>; pjtkoe@gmail.com <pjtkoe@gmail.com>; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org <info@washwestcivic.org>; info@washwestcivic.com <info@washwestcivic.com>; preservation <preservation@Phila.gov>

Subject: Re: Most property owners did not know about the hearing on February 13th, I ask for a re-hearing that is better advertised Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

Great thank you. I'd also recommend L&I inspect all the historic properties in the area for structural deficiencies. Any house with more than two layers of roofing on it should be red-flagged. Similarly, rubble means trouble for foundations, as do leaning party walls and facades, which actually carry loads in many of the older homes with peaked roofs. In addition, the sub-roof are often damaged, rotten and water logged, and the joists are cracked or broken entirely. Max

From: Mark Squilla <Mark.Squilla@Phila.gov>

Sent: Wednesday, April 17, 2024 1:24 PM

To: Max R <maxercize@hotmail.com>; pjtkoe@gmail.com <pjtkoe@gmail.com>; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org <info@washwestcivic.org>; info@washwestcivic.com <info@washwestcivic.com>; preservation <preservation@Phila.gov>

Subject: RE: Most property owners did not know about the hearing on February 13th, I ask for a re-hearing that is better advertised Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

Max

I have also copied Preservation@phila.gov if you want to share your concerns.

Sincerely,

Mark

Councilmember Mark Squilla

1st District City Council

City of Philadelphia

332 City Hall

Philadelphia, PA 19107

p. 215-686-3458

f. 215-686-1931

e. Mark.Squilla@Phila.Gov

From: Max R <maxercize@hotmail.com>

Sent: Wednesday, April 17, 2024 12:12 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>; pjtkoe@gmail.com; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org; info@washwestcivic.com

Subject: Re: Most property owners did not know about the hearing on February 13th, I ask for a re-hearing that is

better advertised Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

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Also, I find many of the newer construction buildings in the neighborhood to be much more appealing. Neighborhoods change over time, as does technology. Again, I ask for a re-hearing and public vote that doesn't require paying the RCO.

From: Max R <maxercize@hotmail.com>

Sent: Wednesday, April 17, 2024 12:08 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>; pjtkoe@gmail.com <pjtkoe@gmail.com>; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org <info@washwestcivic.org>; info@washwestcivic.com <info@washwestcivic.com>

Subject: Most property owners did not know about the hearing on February 13th, I ask for a re-hearing that is better advertised Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

I didn't know about this hearing, and most property owners didn't either, because it was poorly advertised, and perhaps not available online.

I'd like to comment in this process, which I believe is led by a very small group of people, without adequate representation of actual property owners and voters in the community. How many people voted for this proposed district? Again, I do not find it legal or appropriate to have to pay to join the RCO in order to vote. And I note the RCO has come out in favor of this proposal already, despite opposition from people like me, who have never had a vote. I'd also like to note that the building you are attempting to preserve are in many cases structurally compromised. Mortar doesn't last forever, especially old mortar before the advent of portland cement. Often, disassembly and reassembly are the only structural remediation appropriate. I also note the recent earthquake, and the previous earthquake that damaged City Hall, which is also an unreinforced masonry building. Look at what happened to San Francisco in 1906; post-1906 they required reinforced masonry. I also find many of these properties in the historic district to be dilapidated, perhaps because it is prohibitively expensive to repair a building once it has a historic designation. I also note that as far as I can tell, there are only two contractors approved by the historic commission for our area. Will those two contractors renovate and repair all structural deficiencies for all the properties in our area? Again these are very dilapidated structures with insufficient rubble foundations, soft bricks and very soft mortar.

Max Richardson

From: Mark Squilla <Mark.Squilla@Phila.gov>

Sent: Saturday, April 13, 2024 1:49 PM

To: Max R <maxercize@hotmail.com>; pjtkoe@gmail.com <pjtkoe@gmail.com>; WSWCA President <president@washwestcivic.org>; WashWestBoard <WSWBoard@washwestcivic.org>; info@washwestcivic.org <info@washwestcivic.org>; info@washwestcivic.com <info@washwestcivic.com>

Subject: Re: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

Max

This is a community led effort and there will be hearings at the historic commission. I have copied Wash West if you need additional information.

Sincerely

Mark

Councilmember Mark Squilla
1st District City Council
City of Philadelphia
332 City Hall
Philadelphia, PA 19107
p. 215-686-3458
f. 215-686-1931
e. Mark.Squilla@Phila.Gov

From: Max R <maxercize@hotmail.com>
Sent: Saturday, April 13, 2024 12:26:27 PM
To: pjtcoe@gmail.com <pjtcoe@gmail.com>; Mark Squilla <Mark.Squilla@Phila.gov>
Subject: why can't we vote for real on the proposed historic district Re: ePost - Board Meeting Update

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How about we have an actual vote on the proposed historic district? One that allows all community member to vote, without paying to join your organization. Historic designation for all properties within the proposed district is absurd. Historic designation raises costs of renovation substantially. Should my garage be deemed historic? I'd like a vote on it. A real vote, instead of a small number of paying members voting. I once again note that a poll tax is illegal, and was a component of Jim Crow. I see no difference with the current "pay to vote" arrangement via Wash West RCO. Also I'd like to note that none of the promises made by the Arthaus developers have come true, and the building does not look like the version in the original proposal. Furthermore, living next to it during it's construction was a nightmare, as we continually experienced a concrete rain that coated our roofs, and this included the blowout of forms one day on the upper level, that could have killed anyone walking on our block. My property has over \$15,000 in damages to the sidewalk and sewer vent/inlet as a result of their contractors running heavy equipment on it. We were promised they would repair the street and sidewalk to it's original condition; this never happened.

Max Richardson

From: Wash Sq. West Civic Association
<washingtonsquarewest@washingtonsquarewestcivicassociation.ccsend.com>
Sent: Thursday, April 4, 2024 1:02 PM
To: maxercize@hotmail.com <maxercize@hotmail.com>
Subject: ePost - Board Meeting Update

April 3, 2024

WSWCA Newsletter – Board Call Update!

[View as Webpage](#)

Our April 2024 board meeting is at 7pm on
TUESDAY (April 9) via Zoom.

See below for details of our invited speakers – and go to our calendar [here](#) for the meeting link and access details, or copy & paste this web address to your browser:

<https://washwestcivic.org/resources/calendar/>

Please join us!

Invited Speakers

We are honored to welcome as special guests to the board call on Tuesday, Michelle Price from the City of Philadelphia's Commerce Department and our local Councilman, Mark Squilla.

Councilman Squilla, who grew up in South Philly, has represented the City's First District since 2012.

Ms Price will give an overview of her department, the Office of Business Services, and how her team works with businesses around the city.

Councilman Squilla will also speak and he will be happy to take questions.

Police District Merger

Our local community police Officer, Joe Ferrero, will be attending the board call too, to speak about the impending merger of the 6th and 9th Police Districts and answer your questions.

Washington Square West is currently within the boundaries of the 6th Police District.

Wash West Historic District

Our Historic District Nomination is finally ready to move on to the review process.

And, if you live between Walnut Street and South Street in Wash West, you should recently have received a letter from the Philadelphia Historic Commission notifying you of the proposed inclusion of your home or building in the prospective historic district.

The letter also details upcoming Historic Commission hearings about the nomination that you may wish to attend, and where you will also have the opportunity to speak and ask questions.

For more: [**check out our Historic Preservation resource page through the link here.**](#)

WSWCA Events & Opportunities

Plant Exchange in Louis Kahn Park

Spring is with us, and we are once again hosting a neighborhood plant exchange! Bring your cuttings, over-abundant plants, pots, seeds, sprouts and tools to Louis Kahn Park on Saturday, April 13th and trade them in for something new-to-you! (The rain date will be April 14th.)

You can also learn more about the Block Captain program that board member Peter Coë

Fw: En Masse Historical Designation of Washington Square West

preservation <preservation@Phila.gov>

Fri 6/7/2024 7:14 AM

To:Laura Dipasquale <Laura.Dipasquale@Phila.gov>

Cc:Jon Farnham <Jon.Farnham@phila.gov>

From: vfaino@aol.com <vfaino@aol.com>

Sent: Thursday, June 6, 2024 7:18 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>

Cc: preservation <preservation@Phila.gov>; Georgiarae809@aol.com <Georgiarae809@aol.com>

Subject: Fw: En Masse Historical Designation of Washington Square West

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Hi Mark,

Georgia and I were unable to participate in the the Historical Commission's Advisory Committee's public meeting held on May 22nd. Yet we did have an opportunity to listen to the replay a couple of nights ago in its entirety. It was quite evident that the decision by the Advisory Committee to recommend to the Historical Commission, that the process should move forward had already been made and the historical designation of a troublesome number of properties would soon be finalized. Yet, there was no discussion or recognition of the longer term impact of the decision upon Washington Square West as a community. It just seems that the Commission's main focus is on their own established criterion as though that criterion is without flaws of any kind.

Please consider that once almost all of Washington Square West is so designated that future real estate development within our neighborhood is essentially halted. We will no longer have an opportunity to benefit from additional population density. And in a very real sense, our tax base will eventually shrink and those taxpayers that own property in the community, will take on more and more of the tax burden because of what will surely be a lack vertical building projects.

It appears that the demolition of the 12th Street Gym is a driving force behind the far reaching en masse designation of Washington Square West as historical. Members of the Historical Commission, the Historical Commission's Advisory Committee and several members of the Wash West Civic made numerous public statements to that effect. Many of us in the neighborhood did not want to see the mural of Gloria Caseraz destroyed, yet view the new building as a source of tax revenue and of new energy while adding consumers to our population that will support all local businesses for decades.

World class cities somehow protect their existing significant architecture yet seamlessly blend the old with the new through focused legislation and dialogue that protects the public interest. We are relying on a "stroke of the pen" mentality instead. Hopefully, we have asked to commence third-party impact studies that look well out into the future and that consider the longer term impacts of what we are about to finalize.

Thank you,

Vincent and Georgia Faino
1315 Irving Street

Re: Washington Square West Historic Nomination

Barbara Arvanitis <barbara.arvanitis@gmail.com>

Sun 6/9/2024 1:53 PM

To: Paul Steinke <psteinke@preservationalliance.com>

Cc: Tami Sortman <tamisortman@gmail.com>; Deborah Sweeney <deb.sweeney@compass.com>; Robert Sher <rsher@rsher.com>; Peter Coe <pjtcoe@gmail.com>; Drew Moyer <drewalanmoyer@gmail.com>; Hanna Stark <hstark@preservationalliance.com>; Jon Farnham <Jon.Farnham@phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>; Katie Low <washwestkatie@gmail.com>; Marisa Shaaban <marisashaaban@gmail.com>; Andrew Jones <ajoneshs@gmail.com>; Andrew <washwest.af@gmail.com>

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Dear Paul and fellow Board and Historic Committee Members,

It is deeply disappointing to hear that certain stakeholders of vacant lots and surface parking lots have prioritized profit over potential archeological significance as it relates to the history of the Washington Square West District.

Eliminating nineteen of the 21 sites as non-contributing equates to approximately 95% of these properties as being unprotected from future archeological potential.

While I understand the concern that this small and misguided faction could disrupt the final nominating process it is nevertheless extremely disappointing.

I fully support the nomination of 205-27 South 12th, 1000-42 Lombard, 1212-28, 1230 and 1232-34 Lombard.

It is my hope as has been expressed by the Historic Commission that future research regarding these unprotected properties might provide the needed information to categorize them as Criterion for Designation 1.

Thank you for your time and I look forward to the June 14th meeting and nomination of the Washington Square West Historic District.

Sincere Regards

Barbara Arvanitis,
WSWCA Board Member

Re: 1123-1131 Lombard Street, historic designation

Patrick Kocks <patrickkocks@hotmail.com>

Tue 6/11/2024 10:51 AM

To: Jon Farnham <Jon.Farnham@phila.gov>; preservation <preservation@Phila.gov>

Cc: Kim Chantry <Kim.Chantry@Phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>

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Committee on Historic Designation 1515 Arch Street

13th Floor

Philadelphia, PA 19102 preservation@phila.gov

Jonathan E. Farnham, Ph. D. Executive Director

Philadelphia Historical Commission 1515 Arch Street, 13th Floor Philadelphia, PA 19102

Jon.Farnham@phila.gov

Via electronic mail

June 11, 2024

Re: 1123-31 Lombard Street (the "Property") Proposed Washington Square West Historic District Inventory

Dear Dr. Farnham:

I write on behalf of the Board of Directors of the Quince Lombard Community Parking Corporation ("QLCPC"), the owner of the Property. We understand that the Washington Square West Civic Association and Preservation Alliance for Greater Philadelphia submitted a nomination application (the "Nomination") for the creation of the Washington Square West Historic District (the "Proposed District"). We further understand that the Property was identified as a "contributing" property in the Proposed District's inventory.

The Property is currently a surface parking lot. It has been such for decades. The only structure is a brick wall and gate, completed less than 20 years ago with no historical significance. QLCPC is not aware of any archaeological significance to the Property, nor does the Nomination set forth such evidence. Moreover, other than a generalized statement covering the entire Proposed District (one-half mile in area) which would be applicable to much of Philadelphia, there is no mention of any specific archeological significance in and around the Property. Accordingly, we request that the Historical Commission revise the Proposed Nomination's inventory to identify the Property as "non-contributing".

Thank you for your consideration, and please let us know if you have any questions.

Very truly yours,

Patrick J. Kocks, Esq.

QLCPC, Board Member

Re: 1102-1104 Locust Street, historic designation

Patrick Kocks <patrickkocks@hotmail.com>

Wed 6/12/2024 11:55 AM

To: Jon Farnham <Jon.Farnham@phila.gov>; preservation <preservation@Phila.gov>

Cc: Kim Chantry <Kim.Chantry@Phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>

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Committee on Historic Designation 1515 Arch Street
13th Floor
Philadelphia, PA 19102 preservation@phila.gov

Jonathan E. Farnham, Ph. D. Executive Director
Philadelphia Historical Commission 1515 Arch Street, 13th Floor Philadelphia, PA
19102 Jon.Farnham@phila.gov
Via electronic mail

June 12, 2024

Re: 1102-1104 Locust Street (the "Property") Proposed Washington Square West Historic District Inventory

Dear Dr. Farnham:

I write on behalf of the Jessup Street Parking Association ("JSPA"), the owner of the Property. We understand that the Washington Square West Civic Association and Preservation Alliance for Greater Philadelphia submitted a nomination application (the "Nomination") for the creation of the Washington Square West Historic District (the "Proposed District"). We further understand that the Property was identified as a "contributing" property in the Proposed District's inventory.

The Property is currently a surface parking lot. It has been such for decades. It has no structures of historical significance. In fact, it has no structures at all. JSPA is not aware of any archaeological significance to the Property, nor does the Nomination set forth such evidence. Moreover, other than a generalized statement covering the entire Proposed District (one-half mile in area) which would be applicable to much of Philadelphia, there is no mention of any specific archeological significance in and around the Property. Accordingly, we request that the Historical Commission revise the Proposed Nomination's inventory to identify the Property as "non-contributing".

Thank you for your consideration, and please let us know if you have any questions. Very truly yours,
Patrick J. Kocks, Esq.
JSPA - President

I Oppose the Washington Square West Historic District

Paul J Lorenz <paul.j.lorenz@gmail.com>

Wed 6/12/2024 2:48 PM

To: Mark Squilla <Mark.Squilla@Phila.gov>

Cc: Info@washwestcivic.org <Info@washwestcivic.org>; president@washwestcivic.org <president@washwestcivic.org>; preservation@Phila.gov <preservation@Phila.gov>

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Mr. Squilla,

I'm writing to you as one of your constituents and as a resident and property owner within the proposed Washington Square West Historic District. I would like to express my strong objection to the proposed creation of this historic district. The reasons for my objection are many, and I'm sure your office has been hearing similar reasons over the past few weeks.

Our neighborhood is, at its core, a vibrant and dynamic place. This essential dynamism must be celebrated and protected. There are so few places in North America that can sustain such a dense vibrant community while still remaining affordable to a broad and diverse set of residents. The proposed Historic District will destroy our ability to respond to our neighborhoods current and future needs.

My neighbors and I do not want this Historic District to be approved. During last month's meeting with the Historic Commission Designation Committee meeting, an overwhelming majority of my neighbors expressed their strong disapproval for the proposed Historic District. The unelected committee members Suzanna Barucco, Jeff Cohen, Bruce Laverty, Debbie Miller, and Elizabeth Milroy refused to listen to this overwhelming majority, and proceeded to accept the nomination.

As our elected representative, I am urging you to intervene in any way possible, and save our neighborhood.

Sincerely,

-Paul J Lorenz

250 S 13th Street

Comment Submitted for the Philadelphia Historical Commission meeting, June 14, 2024

amanda mott <ammott80@hotmail.com>

Thu 6/13/2024 1:09 AM

To: Jon Farnham <Jon.Farnham@phila.gov>; preservation <preservation@Phila.gov>

Cc: Kim Chantry <Kim.Chantry@Phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>

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I work Friday from 9 to 5 and while I may be able to attend parts of the meeting via zoom, I understand that I can submit comment for inclusion in the official record.

Here is that Comment thanks, Amanda Mott

~

I write to register my opposition to the proposed Washington Square West Historic District.

To be clear I am actually in favor of historic preservation just not in this manner. I feel policing bricks and mortar can be done in a more cooperative and collaborative way, and in a way that engenders true support and civic engagement.

The proposed "Washington Square West Historic District," nomination would suggest that in Philadelphia we value a city of facades, not one that truly wants to protect and celebrate the progressive nature of the neighborhood and the people and stories these monuments and the built environment within the designated boundaries represent. And, for the residents of Washington Square West, my neighbors, most of which I would venture are interested in and support preservation and urbanism, the process has lacked transparency, democratic process, and respect.

With 773 of the 1,509 properties (51%) already currently individually listed in the Philadelphia Register of Historic Places, the argument for now designating the remaining properties is vague, misleading, and incomplete. The map, where you used to be able to find which addresses were included in that inventory now shows only the blanket designation, making it impossible to determine which properties will be affected by the proposal, and leading one to the conclusion that the designation is already a done deal. There was also no adequate process to inform residents of the proposal or timeline. Why the lack of transparency?

Most if not all of the significant examples of historic properties listed in the proposal are already designated, leading to a misleading narrative that they do not enjoy protection.

There are also several errors or omissions in the proposal, "the Former Central Presbyterian Church (832-36 Lombard; recently converted to residential use)" has been a residence for at least a decade or more according to tax records. There is no mention of renowned Philadelphia architect Louis Kahn, who lived at 921 Clinton Street, nor the eponymous community park at 11th and Pine built on the site of the Greystone Luxury Hotel (formerly known as the Gladstone Hotel), demolished in 1971. I note this error and the omission in order to say the nomination is incomplete and vague, perhaps purposefully so. While the nomination references silenced voices, there is no mention of the Lenni Lenape peoples; and no reference to W.E.B. Du Bois important survey.

Between 1983 and 2003, the city designated 10 historic districts, with the City yielding preservation oversight to the Philadelphia Historical Commission in lieu of stricter zoning regulations and enforcement. There are studies that show that such a designation contributes to further gentrification. Look at [Chicago's Lincoln Park](#) or [Philadelphia's Society Hill](#). This gentrification has made living in Center City increasingly prohibitive for many working-class and middle-class families who call it home and who have worked at creating a vibrant community.

I hope that you will consider an amended process and an alternative preservation plan that invites collaboration, innovation, and transparency.

Thanks for your time,

Amanda Mott
Resident 1200 Block of Pine Street


Opposition to the Proposed Washington Square West Historic District

Josh Zugergerman <j.zugergerman@gmail.com>

Thu 6/13/2024 9:45 AM

To: preservation <preservation@Phila.gov>

Cc: Jonathan Hessney <jonathan.hessney@gmail.com>

 1 attachments (181 KB)

6.13.2024 Opposition Letter re Proposed Washington Square West Historic District.pdf;

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Good morning Commissioners,

Attached please find a letter I co-authored and that has been signed by numerous residents of Washington Square West which sets for the legal and practical reasons we oppose the creation of the proposed Washington Square West Historic District.

As explained in greater detail in the letter, while certain properties within the district satisfy certain of the criteria laid out in City of Philadelphia Historic Preservation Ordinance, Chapter 14004(1), as is evident by the simple fact that more than half of the properties in the proposed district are already designated as historic, the proposed district as a whole does not satisfy the criteria.

Instead, this is simply an attempt to use the creation of an entire district to capture properties that would not otherwise qualify on their own. This was laid bare during the May 22, 2024, Meeting with the Committee on Historic Designation, when Mr. Bruce Laverty openly discussed how having a district, as opposed to individual designations, gives the PHC more authority to oversee what happens in the neighborhood. While the desire of Mr. Laverty, and others on the Committee, to vote to recommend expanding the PHC's powers is understandable insofar as they want more control over what the residents of Philadelphia do with their property—it is not legal. Instead, the district must satisfy the criteria set forth in the Historic Preservation Ordinance which, as explained in the attached letter, the proposed district does not do.

I respectfully request that you consider this letter in your deliberations, and that it be included in the public record concerning this matter. Thank you for your consideration.

Josh Zugergerman

409 S. Quince Street

Philadelphia Historical Commission
1515 Arch St., 13th Floor
Philadelphia, PA 19102
Preservation@phila.gov

June 13, 2024

Subject: Opposition to Proposed Washington Square West Historic District

Dear Commissioners,

We, the undersigned, are homeowners and residents in Washington Square West and are writing on behalf of ourselves, and many others in the neighborhood, to oppose the nomination to create the Washington Square West Historic District, as both legally deficient and fundamentally unnecessary.

Legally, the nomination should be rejected because (1) insufficient notice was provided to the affected neighborhood and (2) the neighborhood does not meet the criteria for historic designation, a fact tacitly acknowledged by the Committee on Historic Designation. To approve the designation despite these infirmities will invite litigation to challenge it as arbitrary, capricious, and an abuse of discretion, and may well engender challenges to the City of Philadelphia Historic Preservation Ordinance as impermissibly vague.¹ Instead, the designation should be rejected, and the practice of designating individual properties, as has worked for over half the proposed district, should continue as needed.

INADEQUATE NOTICE:

As you know, the City of Philadelphia Historic Preservation Ordinance, Chapter 14-1000 et seq. lays out the process under which the Philadelphia Historical Commission (“PHC”) may designate a property or district as historic and subject it to PHC oversight. Per Section 14-1004(2), when a district has been nominated, the PHC must, at least 60 days before holding a public meeting to consider the designation:

- (1) Send written notice of the proposed designation to the owners of each building, structure, site or object within the proposed district. The notice shall indicate the date, time, and place of the public meeting at which the Historical Commission will consider the proposed designation;
- (2) Publish notice of the proposed designation of a district as historic in a newspaper having general circulation within the City; and
- (3) Post notice of the proposed designation at locations within the proposed district.

Regarding written notice, there are at least some residents that did not receive any such notices. By way of example, the residents of 1-13 Alder Court never received the written notices that their properties were going to be included in the district. There are likely others that never received written notice and are unaware that their properties are now subject to PHC oversight and may be permanently subject to such oversight if the nomination is approved. After

¹ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

corresponding with Mr. Farnham of the Historic Commission, the Commission does not appear to be able to verify that the 5500+ letters were all sent out and appropriate notice was provided to the property owners.

This issue is further compounded by the failure to publish the proposed designation in a newspaper having general circulation within the City. To satisfy this requirement, the PHC, through the City's Procurement Department published a notice on Page 10 of the March 22, 2024 edition of the *Philadelphia Daily News*. While historically the Philadelphia Daily News was a widely read local newspaper alongside the Philadelphia Inquirer, that cannot be said anymore. The Philadelphia Daily News barely exists, having been subsumed by the Philadelphia Inquirer, a paper that the PHC could have opted to provide notice in, but did not. In short, the Philadelphia Daily News is not a newspaper having general circulation within the city, let alone in Washington Square West.

Finally, the PHC did not provide sufficient posting of notices within the district. On request, the PHC provided pictures of four posts, (at 8th and Pine, 11th and Pine, 12th and Spruce, and 13th and Locust). The boundary of the proposed district extends in some places north of Walnut and all the way down to South St. Four posts scattered along Locust, Spruce, and Pine streets is woefully insufficient to notify all those affected, especially in light of the failure to publish the notice in the Philadelphia Inquirer and to ensure that all those affected received written notice.

The need for proper notice cannot be overstated. The Nominators and their members and supports have had literally years to organize this effort to nominate the neighborhood, but for those of us who just live here, we only found out when we received the letters in March, and only if we actually received those letters. Thus the supporters are organized and have had ample time to marshal their efforts to push this through, while the many of us who are opposed have had to spread the word about what the Nominators and the PHC are trying to do. The failure to properly notify the neighborhood about the nomination compounds the unfairness of the entire process.

In short, due process requires that the PHC comply with the notice provisions laid out above, and which have not actually been met. For those reasons alone, we ask that you reject the nomination or, at a minimum, postpone it to allow the PHC to fully comply with Section 14-1004(2).

FAILURE TO SATISFY THE DESIGNATION CRITERIA:

Even if the PHC had satisfied the notice requirements of Section 14-1004(2), which it did not, the designation should still be rejected for failure to satisfy the criteria for historic designation.

Section 14-1004(1) lays out the criteria for designation. In the nomination application, the Washington Square West Civic Association and the Preservation Alliance for Greater Philadelphia (the "Nominators") claim that the district satisfied subsections (a), (c), (e), (f), (i), and (j).

Section 14-1004(1)(a)

Section 14-1004(1)(a) requires the district to have “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 support this, the Nominators note that the district is a gathering place for Philadelphia’s LGBTQ+ community, its role in the growth of the City’s Black community, and “for its significant value as representative of an important period in the development of the City: in its close juxtaposition of buildings of different historic uses and buildings and streetscapes of different scales, it reflects the period of the city’s development in which Philadelphians of different means and race travelled on foot between residence, work, and community, religious, healthcare, and social organizations and institutions.”

On the first two points, the Nominators only identified five properties as having a link to LGBTQ+ history² and five linked to the Black community,³ and one linked to both communities.⁴ Of those eleven properties, three are already designated. The undersigned take no issue with individually designating the other eight as historically significant, as has been done in the past in Washington Square West, with more than half of the buildings therein being designated. However, the need to protect these eight properties hardly justifies creating a historic district covering 1,441.

On the third point, almost every neighborhood, if not every neighborhood, in Philadelphia would satisfy such a vague claim as a juxtaposition of buildings and different historic uses, different streetscapes, etc. It’s intentionally vague and entirely meaningless. Suffice to say, the district as a whole does not satisfy subsection (a), and to conclude that it did in contravention of the facts would be an abuse of discretion.⁵

Section 14-1004(1)(c)

Section 14-1004(1)(c) requires the district to “[r]eflect[]the environment in an era characterized by a distinctive architectural style.” To satisfy this claim, the Nominators claim that the district contains examples of Federal, Second Empire, late nineteenth- and twentieth-century Revival styles, Greek Revival, Philadelphia’s modernist styles. In other words, the district is not characterized by a distinctive architectural style, but rather contains numerous, individual buildings (many of them already designated as historic) that are from different architectural styles. As said before, even if there are individual building that meet the requirement of subsection (c) that are not currently designated, then such buildings can be designated under this provision. To use a provision that asks about a single distinctive architectural style to designate an entire neighborhood that contains many styles and also includes properties that lack any

² 1116 Walnut St.; 345 S. 12th St.; 205 S. 13th St.; 261 S. 13th St.; and 1003 Spruce St. (Designated in 1958).

³ 1000-42 Lombard Street (currently Seger Park, which is undergoing work on its playground equipment, presumably with PHC approval); 1200-10 Lombard St. (Designated in 1984); 310-12 Quince St. (Designated in 1961); 409-15 S. 11th St.; and 254 S. 12th St.

⁴ 1125-35 Walnut St.

⁵ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

buildings (parking lots and many playgrounds) and thus have no architectural style, is simply overreach. It is clear the district as a whole does not satisfy subsection (c), and to conclude that it did in contravention of the facts would be an abuse of discretion.⁶

Section 14-1004(1)(e)

Section 14-1004(1)(e) requires the district to be “the work of a designer, architect, landscape architect or designer, or professional engineer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or nation” As with subsection (c), the Nominators rely on the district containing some individual buildings that are “important examples of designs by professional architects whose work has significantly influenced the cultural development of the City and beyond.” The Nominators then reference two such architects—“Robert Mills (1781-1855), whose early and representative work on the Franklin and Carolina Rows mark the beginning of a nationally significant career, to that of Oscar Stonorov (1905-1970), represented in the District by Casa Fermi at 1300 Lombard Street.” In the nomination, only one property attributed to Oscar Stonorov,⁷ and only five properties attributed to Robert Mills,⁸ all of which are already registered as historic, and thus do not need district-wide encirclement to protect them.

As with subsection (c), that some of individual buildings in the district are the work of a “designer, architect, landscape architect or designer, or professional engineer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or nation” hardly satisfies the criteria for designating an entire neighborhood of over 1,400 properties that were the work of multiple designers, architects landscape architects or designers, or professional engineers. Further, in many cases, the designers, architects landscape architects or designers, or professional engineers who made the properties were not those whose work “significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or nation,” are entirely unknown,⁹ or are parking lots. Suffice it to say, the district as a whole does not satisfy subsection (e), and to conclude that it did in contravention of the facts would be an abuse of discretion.¹⁰

Section 14-1004(f)

Section 14-1004(f) requires that the district “[c]ontain[] elements of design, detail, materials, or craftsmanship that represent a significant innovation.” To satisfy this claim, the Nominators claim that Washington Square West should be designated because it contains rowhomes (a feature that exists throughout the entire city) and that it is this neighborhood that set the pattern for rowhomes throughout the city. The Nominators even acknowledge that the first recorded group of row homes was Budd’s Row, constructed in 1691 in Old City—not Washington Square West. Further, this type of home was used through the early development of the city, including in

⁶ *Id.*

⁷ 1300-28 Lombard St.

⁸ 923, 929, 931, and 933 Spruce St., and 234-36 S. 8th St.

⁹ By way of example only, in the Nomination the Nominators failed to identify the architect or builder of the properties at 409, 411, 413, 415, 417, and 419 S. Quince St.

¹⁰ *See* A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

what is currently Old City, Society Hill, Rittenhouse Square, and Fidler Square. Further, even if the rowhomes in Washington Square West set the pattern for those that followed, that does not warrant designating the entire neighborhood as historic but rather the earlier rowhomes, which are likely already protected as part of the 53% of the neighborhood that is already designated. To capture the entire neighborhood, which includes rowhomes built long after the pattern for Philadelphia was set,¹¹ homes that are not rowhomes such as high-rise apartment buildings and standalone homes,¹² businesses, parking lots, and playgrounds. It is yet another example of the Nominators attempting to use a select number of buildings that may satisfy one of the criteria, in this case subsection (f) and using it to capture the entire neighborhood. It is simply overreach. Washington Square West, as a whole, does not satisfy subsection (f), and to conclude that it did in contravention of the facts would be an abuse of discretion.¹³

Section 14-1004(i)

Section 14-1004(i) requires the district to have “yielded, or may be likely to yield, information important in pre-history or history.” The Nominators claim that Washington Square West includes multiple lots that have not seen extensive subsurface disturbances since the removal of buildings constructed before the 20th century, and these subsurface lots are likely to yield important information. The Nominators specifically identify only St. Thomas at 203-209 S. 12th Street as an example.

First, it should be noted that 203 S. 12th St. is already designated as historic, and nothing prevents 205, 207, and 209 S. 12th St. from also being designated, which is true for any lot that can be presently identified as being the site of some significant historical structure or event. Second, to the extent the Nominators are focused solely on vacant lots (such as parking lots) under subsection (i), this demonstrate that they cannot use this subsection to capture the entire neighborhood but rather only its vacant lots. In other words, whatever the PHC decides as to the parking lots the Nominators want to designate, subsection (i) cannot be used to justify the designation of lots with structures on top of them—i.e., the vast majority of the proposed district.

It should be noted that, at the request of constituents, the staff of the PHC reassessed the Nominator’s claims about the vacant lots and parking lots they wished to place under PHC oversight as contributing properties, finding that the Nominators had failed to meet their burden as to 19 out of the 21 lots they included in the nomination. In other words, over 90% of the properties the Nominators sought to classify as contributing under subsection (i), upon a second look, failed to meet the criteria. It should also be noted that during the May 22, 2024, meeting, several of the Committee members on the Committee on Historic Designation spoke at length about the need to protect parking lots—totally ignoring the actual criteria set forth by the Nominators.

We ask that the same reexamination that the PHC was apparently willing to take on behalf commercial parking lots be applied to the properties of homeowners who live in the proposed

¹¹ By way of example only, 409, 411, 413, 415, 417, and 419 S. Quince St. were all built in 1963 per the Nomination.

¹² By way of example only, 1225 Waverly St.

¹³ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

district who don't individually have the means to challenge the overreach the Nominators ask the PHC to engage in as do the commercial interests to which the PHC has already conceded.

Finally, if the Nominators pivot to claim that any property in the district, beyond vacant lots, could yield information important to pre-history or history, then the provision has lost any possible limitation, as there are properties like that in every neighborhood of Philadelphia—one may as well declare the entire City a historic district.¹⁴ Once again, even if there are select properties that would satisfy subsection (i), and which are not currently designated, nothing stops someone from nominating that particular property. To seek to apply subsection (i) to the entire neighborhood would be twisting the purpose of the provision well beyond its scope and, would be an abuse of discretion.¹⁵

Section 14-1004(j)

Section 14-1004(j) requires that the district exemplify “the cultural, political, economic, social, or historical heritage of the community.” The Nominators claim that the proposed district satisfies subsection (j) because it is the “location of important aspects of the lives of European immigrants to the City in the period of its substantial growth and development of the District between the early nineteenth and early twentieth centuries.”

It borders on the nonsensical to identify an entire neighborhood and then claim that the neighborhood should be a historic district because the neighborhood exemplifies the “cultural, political, economic, social, or historical heritage of the community.” Of course it does. Every neighborhood perfectly exemplifies the cultural, political, economic, social, or historical heritage of neighborhood—how could it not, when you've captured the entire community as part of the subsection. To read subsection (j) to allow one to capture an entire neighborhood renders it limitless. Instead, subsection (j) should be read to ask whether a particular property or group of properties within a larger community exemplifies that community. The nomination's inventory does not cite a single specific property that supports subsection (j). A reader is left to wonder for themselves what buildings (or parking lots) should be preserved to “lives of European immigrants”. Since the nomination is for the entire district, it cannot satisfy subsection (j).

Even if one considered the Nominator's particular claim, it should still fail. Here the Nominators attempt to use a fact that applies to multiple neighborhoods in Philadelphia, and in this case that applies to most cities on the Eastern Seaboard of the United States. European immigrants moved to many Philadelphia neighborhoods in the early 1800s and 1900s—not just Washington Square West. If the presence of important aspects of the lives of European immigrants into the City warrants the designation of the entire neighborhood—as opposed to actually identifying which properties within the neighborhood were the important aspects, there really is no limit to the subsection. Further, in relying on the neighborhood having important aspects of European immigrants, the Nominators fail to recognize that subsection (j) requires that the district

¹⁴ If subsection (i) can be used to capture an entire area because some of the properties may yield information important in pre-history or history, then there is no logical reason that such a claim could not be made for the entire city or any subsection thereunder. Find one property in Northeast Philadelphia that satisfies subsection (i) and designate the entire portion of the city.

¹⁵ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

“exemplify the cultural, political, economic, social, or historical heritage of the community”—meaning the Washington Square West community. Our community is not just European immigrants and those descended from them but rather a wildly diverse community that has members from all over the world. To designate the entire district because Europeans settled here is misguided at best. Suffice it to say, the district does not satisfy subsection (j), and to find otherwise would be an abuse of discretion.¹⁶

Lack of Specificity

The nomination, as presented, lacks any structure to hold it together and justify the designation of the district. Six criteria are cited for the district, none of which could accurately be applied to the entire nominated district. At best each criterion applies to small portions or individual structures in the district.

The nomination then states a “Period of Significance” from 1740 to 1985, a span of 245 years of history, encompassing periods prior to the founding of our country (and less than 60 years after the founding of Philadelphia itself) up to the beginning of construction of One Liberty Place. This period is only justified by book-ends, “the establishment of Mikveh Israel Cemetery in 1740 . . . until the solidification of Washington Square West as a LGBTQ+ community.” No justification is given for the intervening years. The criteria for designation require specificity. An “event”, an “environment”, an “architectural style”, a “designer”, a “significant innovation”, a “motif”. What this nomination lays out is a mix of general statements, mixed together to try to justify a district without any unifying characteristic or theme based on a buffet of criteria.

When the reader continues to the property inventory, the factual basis to justify the designation is missing. Most properties have a bare bones description of the property and a picture. Some even lack the picture because they are not visible from the right of way. Explanations of how a property supports designation under criteria A, C, E, F, I or J are rare. Classifications of properties as Contributing or Non-Contributing are mostly done without explanation. This leaves the nomination without a firm footing in facts to justify designating 1441 properties. Nowhere does the nominating document explain the borders of the district, how the individual properties in the district support the given justifications, why individual properties are classified as contributing/non-contributing, or the actual historical significance of most buildings. For the commission to allow such a weak nomination to proceed, that makes general statements about pieces of a district, then uses them to justify designating a much broader area, without sufficient documentation at the property level would be an abuse of discretion, and would invite a challenge to the law itself and the way it is applied for impermissible vagueness.

¹⁶ *Id.*

CONCLUSION:

As is discussed above, the district as a whole does not satisfy any of the selected criteria, and should be rejected. Opting to designate despite these infirmities would require the PHC to ignore the limits placed in the City of Philadelphia Historic Preservation Ordinance, and would invite legal action to overturn the decision and possible to find the statute void for vagueness if it can be applied in such a manner.

This is especially true when, per the nomination, 53% of the properties in the district are already designated. What legal justification could there possibly be to designate the remaining 47% when it is clear that the truly historic have already been designated, and any truly historic properties that somehow remain outside the PHC's jurisdiction can still be individually designated.¹⁷ The only possible justification would be extra-legal—an attempt to exercise oversight over properties that do not warrant it.

This desire was made clear during the May 22, 2024, Meeting with the Committee on Historic Designation. During that meeting, after numerous residents objected to the designation of the entire neighborhood, the members of the Committee discussed the proposal. During that discussion, Mr. Bruce Lavery openly discussed how he was struck by the loss of Jewelers Row and that he was shocked that it hadn't already been designated, and stated that "at the very least, what a historic district as opposed to an individual historic nomination does is it gives us some, some stakes, to put down, and say, if there's gonna be a demolition or if there's gonna be some major change, let's look at this twice, as [sic] opposed to, finding out the hard way how, you know, how could how could we lose this."

As should be obvious, Mr. Lavery said the quiet part out loud.¹⁸ Designating the entire district solely in order to be able to control what happens in it is not at all what the City of Philadelphia Historic Preservation Ordinance allows. Should the PHC take the same perspective as Mr. Lavery and designate the district in spite of it not satisfying, as a whole, the criteria laid out in Section 14-1004(1), would constitute an abuse of discretion.

¹⁷ The currently undesignated properties are frequently unremarkable buildings from the past 50 years, new builds (some still under construction), and the aforementioned "historic" parking lots and playgrounds.

¹⁸ One of the Committee members, Elizabeth Milroy, even expressed that designation would be a "wonderful way for property owners to learn about where they live" and that residents would be "able to consult the staff of the historical commission." As should be clear, the City of Philadelphia Historic Preservation Ordinance does not allow the PHC to designate a neighborhood because it patronizingly wishes for its residents to learn more about their history and to come to the PHC as a resource.

In sum, we ask that the Philadelphia Historic Commission reject the proposed Washington Square West Historic District and to continue to allow the current process of individual designation to continue in our neighborhood.

Respectfully submitted,



Joshua Zugergerman
409 S. Quince Street



Jonathan Hessney
President Alder Court HOA
9 Alder Court

<u>/s/ Shahrukh Tarapore</u> Shahrukh Tarapore President, Washington Mews Home Owners Association 11th & Lombard Sts.	<u>/s/ Mantreh Atashband</u> Mantreh Atashband 1110 Lombard Street	<u>/s/ Kevin Hoekzema</u> Kevin Hoekzema 825 Lombard Street	<u>/s/ Colin Flannery</u> Colin Flannery 1031 Spruce Street, Unit 105
<u>/s/ Eleanor Wilner</u> Eleanor Wilner 324 S. 12th Street	<u>/s/ Leonard A Shatz</u> Leonard A Shatz 2 Alder Court	<u>/s/ Andrea Korb</u> Andrea Korb 1119 Lombard Street	<u>/s/ Zachary Bloom</u> Zachary Bloom 1035 Lombard Street, #13
<u>/s/ Susan Levesque</u> Susan Levesque 1035 Lombard Street 5 Alder Court	<u>/s/ Fareeha Arshad</u> Fareeha Arshad 417 S. Quince Street	<u>/s/ Stephanie Lai</u> Stephanie Lai 9 Alder Court	<u>/s/ derek levesque</u> derek levesque 1035 Lombard Street, # 5
<u>/s/ Caroline Shatz</u> Caroline Shatz 1027 Waverly Street	<u>/s/ Joshua Dillard</u> Joshua Dillard 1033 Spruce Street, Apt 101	<u>/s/ Benjamin Honig</u> Benjamin Honig 416 S. 10th Street	<u>/s/ Eric Bause</u> Eric Bause 1203 Lombard Street
<u>/s/ Dana Ovadia</u> Dana Ovadia 416 S. 10th Street	<u>/s/ Jonathan Cooper</u> Jonathan Cooper 424 S. 11th Street	<u>/s/ Vaidehi Mehta</u> Vaidehi Mehta 1124 1/2 Lombard Street	<u>/s/ Richards & Patricia Jarden</u> Richards & Patricia Jarden 7 Alder Court
<u>/s/ Abbie Dillard</u> Abbie Dillard 1033 Spruce Street, Unit 101	<u>/s/ Eileen Harris</u> Eileen Harris 424 S. 11th Street	<u>/s/ Lisa Belisonzi</u> Lisa Belisonzi 263 S. 9th Street, Apt 3F	<u>/s/ Lauren Sinnenberg</u> Lauren Sinnenberg 1022 Addison Street

<u>/s/ Colin Murphy</u> Colin Murphy 1317 Rodman Street	<u>/s/ Richard Brome</u> Richard Brome 1210 Pine Street	<u>/s/ Paul Lorenz</u> Paul Lorenz 250 S. 13th Street	<u>/s/ Joe Pileri</u> Joe Pileri 323 S. Camac Street
<u>/s/ Amanda Mott</u> Amanda Mott 1205 Pine Street	<u>/s/ Jerry Ratcliffe</u> Jerry Ratcliffe 1321 Rodman Street, #3B	<u>/s/ Matthew Kaganovich</u> Matthew Kaganovich 1100 Spruce Street, Apt. 1A	<u>/s/ Pauli Hicks</u> Pauli Hicks 412 S. 11 Street
<u>/s/ Kathleen Garris</u> Kathleen Garris 412 S. 11th Street	<u>/s/ Matt Genstein</u> Matt Genstein 1007 Lombard Street	<u>/s/ Kevin Ryan</u> Kevin Ryan 1317-21 Rodman Street, Apt 3A	<u>/s/ Francine Sandrow</u> Francine Sandrow 825 Lombard street
<u>/s/ Raven Rimerman</u> Raven Rimerman 206 S. 13th Street, Apt. 404	<u>/s/ Carl Lysaght</u> Carl Lysaght 1026 Pine Street, #7	<u>/s/ Elisabeth Morlino</u> Elisabeth Morlino 1317-1321 Rodman Street, Unit 3C	<u>/s/ Chris DiCicco</u> Chris DiCicco 1215 Spruce Street, #301
<u>/s/ Alice Goffman</u> Alice Goffman 409 S. Quince Street	<u>/s/ Daniel Zahn</u> Daniel Zahn 1041 Lombard Street	<u>/s/ Micaela Segura Arias</u> Micaela Segura Arias 1041 Lombard Street	<u>/s/ Philippe Met (and Yue Zhuo)</u> Philippe Met (and Yue Zhuo) 1026 Waverly St
<u>/s/ Joni Baumgarten</u> Joni Baumgarten 1212 Lantern Square	<u>/s/ Miguel Mostafa</u> Miguel Mostafa 420 S. 11th Street	<u>/s/ Todd Pitock</u> Todd Pitock 318 S. 12th Street	

Washington Square West Historic District - Opposition

Matt Reese <mfreese89@gmail.com>

Thu 6/20/2024 9:17 AM

To:preservation <preservation@Phila.gov>

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Hello,

My name is Matthew Reese, PE AICP, and I live at 1134 Waverly Street, Unit 1, Philadelphia PA 19147. I am e-mailing you to express my opposition to the designation of Washington Square West Historic District. While I support specific buildings being designated as historic, I opposed this district for the following reasons:

1. Historic districts lead quickly to gentrification, such as in Society Hill.
2. Historic districts lead to increased housing prices, and as someone who can only afford to own property in Center City due to the plethora of housing types, including Trinities, I would find it hard pressed to afford to live in a Historic District. (Historic windows alone cost 3-4 times the amount as compared to standard windows,\$15k+.)
3. By designating a historic district, individuals who are opposed to this move are then forced to conform to the ideals of what others believe is "historic" and "aesthetically ideal." This is both a financial and an aesthetic burden. What is "historic" is often defined by the eye of the beholder, as many of the buildings in Philadelphia were "ugly" when first constructed, but are now beloved treasures.
4. I believe that development and growth is important to a city both culturally and affordably. If the neighborhood is trying to prevent construction of skyscrapers and high rises in the community, Zoning is a much more appropriate way to handle this.

Thank you for your time.

Sincerely,
Matt Reese

Re: Postponing Wash West Historic Designation - Required Notice Has Not Been Provided

Jonathan Hessney <jonathan.hessney@gmail.com>

Sun 6/30/2024 2:42 PM

To: preservation <preservation@Phila.gov>

Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson <Kenyatta.Johnson@Phila.gov>; Jon Farnham <Jon.Farnham@phila.gov>

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Dear Historic Commission-

We request the board to continue the proceeding until:

1. The Historic Commission staff corrects the deficiencies in the notice requirements, including:
 1. Using a verifiable form of mailing (ex. Certified mail) to ensure all property owners receive notice. There are many who have never received the required amiled notice, and commission staff have not provided verification that the letters went out.
 2. Posting notice in a paper of "general circulation", rather than the barely extant Philadelphia Daily News.
 3. Posting notice prominently on each block of the proposed historic district, rather than at only 4 locations.
2. The Historic Commission staff reviews all properties to verify they meet the "evidence and specificity" standards applied to the parking lots. Most properties that are not already individually designated are lacking any specific evidence that they are historic, the same as the parking lots. We don't see why the commercial owners of parking lots should receive disparate preferential treatment over homeowners.

We'd expect this would take at least 90 days (30 days to cure the defects, plus the required 60 days post notice for a meeting), but this should not be re-calendared until the commission staff has corrected the deficiencies in the process.

Please include the entire email thread below of our discussion of these issues with the historic commission in the public record.

Best Regards,

Jonathan Hessney
President, Alder Court HOA

On Wed, Jun 26, 2024 at 4:38 PM Jon Farnham <Jon.Farnham@phila.gov> wrote:

Mr. Hessney:

You are welcome to request that the Historical Commission continue the review of the Washington Square West Historic District nomination. However, please note that the Historical Commission emphatically asserts that the notice of consideration of the historic district was provided to all property owners in compliance with all law and regulation. If you are, in fact, requesting a continuance of the review, please respond to this email and indicate how long of a continuance you are requesting. The Historical Commission generally requires that the length of the requested continuance be specified in any such request. Thank you.

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission

From: Jonathan Hessney <jonathan.hessney@gmail.com>

Sent: Tuesday, June 25, 2024 10:49 AM

To: Jon Farnham <Jon.Farnham@phila.gov>

Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson

<Kenyatta.Johnson@Phila.gov>

Subject: Re: Postponing Wash West Historic Designation - Required Notice Has Not Been Provided

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Mr. Farnham-

I'm writing to re-issue my request for a continuance until the defects with notice are corrected.

We are still encountering new neighbors that have never received notice. As previously discussed:

1. The commission cannot confirm that all 5500+ letters actually went out. Many residents report having not received the notice
2. The newspaper notice was placed in a paper that does not have a website, cannot be subscribed to and we can't find a place to purchase
3. The 4 - 8.5"x11" physically posted notices, in a district with 1400+ properties, is not a reasonable way to notify that many residents spread out over such a large area.

The designation of 1400+ properties as historic is a significant action, there are statutory requirements for notice for a reason, and the historic commission hasn't met those requirements. Your comment that I found out and am participating is evidence that notice occurred is not sufficient. The statute does not provide for alternate forms of notice, and dismissing the requirements will leave those who are not as digitally connected and aware out of the process. We do not know who isn't aware because they haven't received notice and don't even know this is going on. We do know that there are residents who only know because neighbors reached out to them. The historic commission needs to correct the deficiencies in notice prior to proceeding.

Please include this entire email chain in the public record.

Thank you,

Jonathan Hessney

On Tue, Jun 11, 2024 at 1:00 PM Jon Farnham <Jon.Farnham@phila.gov> wrote:

Mr. Hessney:

Thank you for your additional emails. Regarding questions 1 and 2, I have already responded to those questions. Moreover, notice is not an end unto itself but is a means of informing property owners of their opportunity to participate in the Historical Commission's designation deliberations. You are clearly participating in the deliberations, so the goal of notifying you about the deliberations has undeniably been met. Regarding questions 3 to 6, the Historical Commission's staff will not be making any additional recommendations to the Historical Commission prior to its review of the nomination of the proposed Washington Square West Historic District on Friday, June 14. You will have ample opportunity to express your opinions on the proposed historic district at that meeting. Thank you again for your emails.

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission

From: Jonathan Hessney <jonathan.hessney@gmail.com>

Sent: Tuesday, June 11, 2024 11:27 AM

To: Jon Farnham <Jon.Farnham@phila.gov>

Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson <Kenyatta.Johnson@Phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>; preservation <preservation@Phila.gov>

Subject: Re: Postponing Wash West Historic Designation - Required Notice Has Not Been Provided

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Mr Farnham-

I'm following up on open questions, and consolidating them in one place for ease of reference:

1. Is the mailroom able to provide proof that all 5500+ letters went out to property owners? Alder Court residents still haven't received the notice in the mail.
2. How does one acquire the Philadelphia Daily News, since it's not online, can't be subscribed to, and seems to be hard to find for sale anywhere? Where can it be acquired? What's the circulation?
3. Will the staff be recommending to the commission to continue the proceeding to another date? Particularly because the notice requirements haven't been met?
4. Will the staff recommend denying the nomination? The nomination as a whole lacks the specificity and evidence at the property level necessary to support the nomination of an entire district.
5. Will the staff recommend removing 1-13 Alder Court from the nomination? There's been a documented lack of notice to this particular community. Most of the properties aren't visible from the right of way. No specific evidence is provided in the nomination inventory to support designating the Alder Court properties.
6. Will the staff recommend changing the designation of 1-13 Alder Court from "Contributing" to "Non-contributing"? There's been a documented lack of notice to this particular community. Most of the properties aren't visible from the right of way. No specific evidence is provided in the nomination inventory to support designating the Alder Court properties.

Best Regards,

Jonathan Hessney

On Mon, Jun 10, 2024 at 4:08 PM Jonathan Hessney <jonathan.hessney@gmail.com> wrote:
Please find an example Alder court inventory page below.

WASHINGTON SQUARE WEST HISTORIC DISTRICT INVENTORY

ADDRESS: 2 ALDER CT

Alt. Address(es):

Current Name:

PRHP Listed:

Historic Name:

NRHP Listed: 9/20/1984 WWHD

Year Built: 1970 +/-

Year(s) Altered:

Architect: Louis Sauer

Historic Function:

Builder:

Hist. Resource Type:

Assoc. Individual(s):

References:

History Notes:

Part of 13-property development including attached courtyard houses and townhouses.

Stories: 3

Bays:

Style: Modern

Resource Type: Courtyard house

Use: Residential

Foundation:

Windows:

Roof Material:

Doors:

Exter. Wall Material: Stucco

Ancillary Structure(s):

Add. Wall Material:

Landscape Features: Sidewalk:

Survey Notes:

Not visible from public right-of-way.



CLASSIFICATION: Contributing

On Mon, Jun 10, 2024 at 3:49 PM Jonathan Hessney <jonathan.hessney@gmail.com> wrote:

Mr. Farnham-

Thank you for the clarification. Will the staff be recommending to the commission to continue the proceeding to another date? Without proper notice, we don't see how the meeting can proceed.

The inventory pages for Alder Court do not contain mention of any criteria, whether interpreted strictly or not. Most don't have facade pictures even, as they are not visible from the right of way. Why we are being designated, and on top of that being classified as Contributing is not done with any specificity or supporting evidence in the nomination. We ask to be removed from the designation, and failing that, downgraded to non-contributing, since there is nothing to support the designation or classification in the nomination.

Best Regards,

Jonathan Hessney

On Mon, Jun 10, 2024 at 3:37 PM Jon Farnham <Jon.Farnham@phila.gov> wrote:

Mr. Hessney:

Thank you for your email. I apologize if I was not clear in my earlier email, but the review of the nomination for the Washington Square West Historic District has not yet been continued by the Historical Commission. Your request for a continuance has been indicated on the agenda for the meeting on June 14, but the Historical Commission has not yet continued the matter. The Historical Commission's staff does not have the authority to grant the continuance, so any decision on the request must wait until the meeting on Friday, June 14. The Historical Commission will consider your request at that meeting. If it grants the request to continue the review, the review will be postponed to a later meeting. If it declines to grant the request, the review of the nomination will proceed on June 14.

Regarding your request to reconsider the inventory and especially the classifications of the Alder Court properties, my colleagues and I will review the inventory pages for Alder Court before Friday's meeting. However, I will note that the archaeology criterion for designation in the City's historic preservation ordinance sets a baseline for designation that is more strict than designation under the other nine criteria, and, upon reassessment, the staff concluded that that stricter archaeology standard had not been met for most properties. The staff did not reach that same conclusion regarding the arguments for the other criteria.

Thank you again for your email.

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission

From: Jonathan Hessney <jonathan.hessney@gmail.com>

Sent: Monday, June 10, 2024 11:44 AM

To: Jon Farnham <Jon.Farnham@phila.gov>

Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson <Kenyatta.Johnson@Phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>; preservation <preservation@Phila.gov>

Subject: Re: Postponing Wash West Historic Designation - Required Notice Has Not Been Provided

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Mr Farnham-

Thank you for putting the continuance on the agenda. Since now only the continuance is on the agenda, but not the nomination itself, does that mean that the designation will not be considered this Friday, regardless of the vote on the continuance? Is the staff recommending or opposing the request for the continuance?

It's also come to my attention that the staff is no longer recommending that most of the parking lots be considered "contributing" due to a lack of evidence and specificity. We would ask that the same level of rigorous scrutiny be applied to the nomination as a whole and to the Alder Court HOA properties. I do not see enough corresponding evidence and specificity for any of the criteria to support the designation. Most properties in the inventory have no commentary, explanation of a link to the criteria, or justification for why they are "Contributing" or "Non-contributing".

Specifically for 1-13 Alder Court, the properties are listed as "Contributing". Most are not photographed and are not visible from the right of way. There is no mention of which criteria are supposed to apply to any of our properties, or why they should be considered "Contributing". There is no evidence attached to justify designation or a "Contributing" status. There is no explanation of how this could even apply to properties that the commission is unable to survey, and the public is unable to view.

We ask that the staff apply the same scrutiny to the rest of the nomination that was applied to the parking lots, and continue to follow your own advice for all criteria, not just Criteria I: " **The Historical Commission has an affirmative obligation to demonstrate to the property owners with the nomination that the sites have yielded or may be likely to yield important information before designating under Criterion I. The nomination's discussion of Criterion I and the supporting inventory information lack the requisite level of specificity. Moreover, any designation under Criterion I without supporting evidence in the nomination could place the entire district at risk on appeal.**"

We would ask that the staff recommend against the entire nomination because "the supporting inventory information lack the requisite level of specificity" for all criteria, and that any designation "without supporting evidence in the nomination could place the entire district at risk on appeal." At minimum, we request that 1-13 Alder Court be downgraded to "non-contributing" due to a lack of specificity, evidence and visibility from the right of way.

Thank you,

Jonathan Hessney

On Fri, Jun 7, 2024 at 3:25 PM Jonathan Hessney <jonathan.hessney@gmail.com> wrote:

Mr Farnham-

Thank you for your considered response. Just checked on the agenda and I see one posted, but without an agenda item for postponement. I've attached what I found online. Will this be updated with the postponement agenda item?

Proof that the letters actually went out would be helpful. With 5500+ letters going out it is quite possible for some to be missed and not meet the notice requirements in the city code.

Again, for the newspaper I'm not clear how it's in "general circulation". The link on the screenshot you sent is for a site owned by ancestry.com, not a Philadelphia Daily News link or even an Inquirer link. While ancestry.com has many uses, I don't think it's a place for "general circulation" newspapers. I'm still not seeing how to actually get a copy of this publication on the street or to subscribe to it. If it's not broadly available to the public in Philadelphia, I don't think it would be a newspaper of "general circulation". Maybe the procurement department can help clarify how to subscribe to the paper, and the locations it's available for sale throughout the city?

Again, I politely ask for the meeting to be postponed due to lack of proper notice. Multiple property owners never received a letter and as of now there doesn't appear to be verification that every letter went out. The newspaper of "general circulation" doesn't appear to generally circulate. And while the commission appears to have met the letter of the code for posting in the district, it seems to miss the spirit of making sure people notice. Four 8.5"x11" sheets on lamp posts for providing notices to 2750+ property owners that they will be losing a portion of their property rights, seems out of proportion to the impact, especially compared with the posting done for a zoning variance on just a single property (large orange sign, must be up for 21 consecutive days).

Thank you,

Jonathan Hessney

On Fri, Jun 7, 2024 at 1:28 PM Jon Farnham <Jon.Farnham@phila.gov> wrote:

Mr. Hessney:

The notice letters were mailed through the City of Philadelphia's mailroom, which handles all USPS mail sent by City agencies including water bills, tax bills, etc. I can inquire with the mailroom to see what sort of records it keeps regarding proof of mailings. The Historical Commission delivered more than 5500 letters to the mailroom for mailing. The number is greater than double the number of resources listed in the inventory for the district because many properties in the neighborhood are condominiums and letters were sent to all property owners including condominium unit owners.

The Philadelphia Daily News is a longstanding local tabloid-type newspaper. My understanding is that it is currently published by the Inquirer. The Historical Commission does not place its legal notice ads itself. They are placed in newspapers of general circulation by the City's Procurement Department, which has a unit that handles all legal notices for all City departments. I am attaching the entire page from the digital version of the paper with the legal notice of interest.

The Historical Commission's only guidance regarding the posting is the requirement enumerated in Section 14-1004(2)(b) of the Philadelphia Code: "The Historical Commission shall post notice of the

proposed designation at locations within the proposed district at least 60 days before the public meeting to consider the proposed designation." The Historical Commission's Rules and Regulations do not elaborate on the Code.

Your postponement request has been placed on the agenda of the Historical Commission meeting on June 14. The agenda will be released publicly later this afternoon. The Historical Commission will consider the request at the start of its review of the matter, before it delves into the merits of the nomination. Persons attending the meeting will be given an opportunity to comment on the request before the Commissioners make a decision on it.

Section 5.16.c of the Historical Commission's Rules and Regulations addresses postponement requests for districts. The Historical Commission's staff does not have the authority to postpone the review of historic district nominations. The Historical Commission is obligated to make such decisions at public meetings because they involve many property owners, thousands in this case. Everyone has to be given an opportunity to participate in the deliberations.

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission

From: Jonathan Hessney <jonathan.hessney@gmail.com>
Sent: Thursday, June 6, 2024 4:20 PM
To: Jon Farnham <Jon.Farnham@phila.gov>
Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson <Kenyatta.Johnson@Phila.gov>; jmattioni@mattioni.com <jmattioni@mattioni.com>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>; preservation <preservation@Phila.gov>
Subject: Re: Postponing Wash West Historic Designation - Required Notice Has Not Been Provided

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Mr. Farnham-

Thank you for the response. I'm rather new to these city processes, and would appreciate some clarification on a few things:

1. For the letters, is there a record that they actually went out? Possibly a tracking number? They were not received by a group of property owners and I know with over 2800 letters to mail, it's possible for things to slip through the cracks.
2. I was not aware that there is a paper called the Philadelphia Daily News. I can't seem to find it online, or a way to subscribe. I also went to a couple of newsstands to ask for it, and couldn't find one that carries it. Where could I possibly find a copy of it to see a notice?
3. For the postings in the district, does the commission have guidelines regarding the number of postings and how long they should remain up, relative to the size of the proposed district? This is a rather large proposed district and just from my experience, I know I missed them.

You mention that the Historic Commission can consider postponing the meeting at the meeting. Will the postponement request be placed on the agenda? If not, how would it be considered? Especially if we're not supposed to contact members of the commission.

Again, I'd like to urge commission staff to postpone the meeting, as there is a significant block of property owners that did not receive notice, even though that may have not been the intent, and therefore haven't been afforded a true opportunity to engage in the due process of the consideration. I don't see what the rush is and why the meeting can't be postponed to allow everyone sufficient time to engage in the process.

Thank you,

Jonathan Hessney

On Wed, Jun 5, 2024 at 11:25 AM Jon Farnham <Jon.Farnham@phila.gov> wrote:

Mr. Hessney:

Thank you for your email to the Philadelphia Historical Commission on behalf of the Alder Court Homeowners Association of June 4, 2024 regarding the proposed Washington Square West Historic District. Copies of it will be provided to the members of the Historical Commission.

In your email, you request that the Historical Commission postpone the review of the nomination proposing a Washington Square West Historic District from its meeting of June 14, 2024 to a later, unspecified date. The Historical Commission can consider that request at its June 14 meeting in advance of any consideration of the merits of the nomination. You also request that the Historical Commission remove the properties at 1-13 Alder Court from the proposed district. The Historical Commission can consider that request when it reviews the nomination on June 14 or at a later date.

In your email, you claim that the Historical Commission failed to notify property owners of the review of the nomination proposing a Washington Square West Historic District. That claim is incorrect. The Historical Commission met all notice requirements as enumerated in Section 14-1004(2)(b) of the Philadelphia Code as well as all other provisions of state and local law and regulation. I am attaching copies of the notice letters, dated March 21, 2024, mailed to all property owners and properties at Alder Court with accompanying inserts. The address information for the letters was obtained from City of Philadelphia property tax records, as required by the Code. I am attaching a copy of the legal notice announcing the consideration of the proposed historic district, which was published on page 10 of the March 22, 2024 edition of the *Philadelphia Daily News*. I am attaching a copy of the poster announcing the consideration of the proposed historic district that was hung in the area on March 21, 2024, along with some photographs of the poster hanging in the proposed district taken on March 21, 2024.

I note that you cc'ed John Mattioni, a member of the Historical Commission, in your email of June 4, 2024. In the future, please do not directly contact members of the Historical Commission regarding matters that are or may be pending before the Historical Commission. Please contact the staff of the Historical Commission, but not the members. Contacting a member of the Historical Commission directly in an attempt to influence that member with regard to a matter that is or may reasonably be expected to be pending before the Historical Commission can be a violation of Section 20-605 of the Philadelphia Code, the City's exparte communication law.

Thank you again for your email, which, as I noted, will be provided to the Commissioners.

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission

From: Jonathan Hessney <jonathan.hessney@gmail.com>

Sent: Tuesday, June 4, 2024 4:58 PM

To: Jon Farnham <Jon.Farnham@phila.gov>; Laura Dipasquale <Laura.Dipasquale@Phila.gov>

Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson <Kenyatta.Johnson@Phila.gov>; jmattioni@mattioni.com <jmattioni@mattioni.com>

Subject: Postponing Wash West Historic Designation - Required Notice Has Not Been Provided

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Mr. Farnham-

I am writing on behalf of the Alder Court Homeowners Association to object to lack of notice, and our inclusion in the proposed Washington Square West historic district. We are 13 properties located at 1-13 Alder Ct.

Due to lack of required notice and deficiencies in the nomination document, we are requesting the designation meeting on June 14th be postponed and that 1-13 Alder Court be removed from the proposed district.

Most of our members have only found out about the nomination from the HOA or neighbors. Only one member has reported receiving a letter from the historic commission notifying them of the nomination.

The city code requires notice 60 days prior to a public meeting for consideration of the district to include:

1. **Written notice by mail** - I have not received this notice and neither have most of the HOA property owners
2. **Publication in the newspaper** - We have not seen and after searching cannot find a published notice in a newspaper
3. **Posted notice in the district** - We have not seen notice physically posted at locations within the district

Designation requires this notice to allow participation in the process by property owners who would be subject to the restrictions and costs associated with historic designation. We have not received that notice and don't believe the historic commission has met the requirements laid out in the city code to hold the meeting to determine designation.

Separately we do not see the rationale for including 1-13 Alder Court in the historic district. In the property inventory, we are marked as "contributing" without any explanation why. Our understanding is that would subject our properties to a higher degree of scrutiny than "non-contributing properties. The inventory lacks photos of the facade of 8 of the properties, since they are not visible from the right of way. The notes on our property records in the inventory are:

1. Survey notes for 8 of 13 properties : " Not visible from public right-of-way"
2. History notes: " Part of 13-property development including attached courtyard houses and townhouses."

Why properties that the public cannot view should be subject to designation is highly questionable. How being part of a "13-property development" makes the properties "contributing" is not defended.

In light of the lack of required notice, and the deficiency in the nomination documentation, we ask that the meeting on June 14th be postponed and that the 1-13 Alder Court be removed from the proposed district.

Thank you,

Jonathan Hessney
President, Alder Court HOA

my public comments for July 12 PHC meeting re: Wash West historic designation, per PHC instructions

Lynn Landes <lynnlandes@gmail.com>

Tue 7/9/2024 9:12 AM

To: preservation <preservation@Phila.gov>

Cc: Jon Farnham <Jon.Farnham@phila.gov>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

My name is Lynn Landes and I live 217 S. Jessup Street, Philadelphia, PA 19107. I am also the Co-Founder of SmallStreetsPhilly.org

I already gave public comments at the June PHC meeting, but then the meeting was postponed, so I am submitting an updated comment. I support the PETITION to the Philadelphia Historical Commission's (PHC) to continue the proposed Historic Designation of Washington Square West until the September 2024 meeting, at least, for the following reasons:

- July and August are vacation months, and it is likely that considerably more people will be able to attend the PHC meeting in September.
- The fact that not all affected Washington Square West property owners, such as the Alder Court Homeowners Association and The South Jessup Street Parking Lot Association, were informed of the designation.
- Nor were most property owners notified nor invited to participate in the serious talks which reportedly commenced three years ago between PHC, Wash West Civic, and The Preservation Alliance about this historic designation.
- Due to the broad impact and serious legal nature of the proposed historic designation, which could be considered a "taking" of sorts, and includes increased costs for home improvements and repairs, as well as the increased cost and/or availability of homeowners insurance, which have not been adequately addressed in PHC's online information, as yet.
- Noting that the PHC's 'restrictions on' and 'options for' property owners under a historic designation continue to be extremely vague, and in many cases non-existent, such that until those restrictions and options are clarified, the public will be unable to make reasonably "informed" public comments in support of, or opposition to, this designation.
- Recognizing that the criteria for qualifying for the designation is so broad and vague as to encompass a 300-year span, purportedly ending in the 1980's, which essentially could be used to co-opt the property rights of property owners anywhere in Philadelphia.
- In concern over misstatements by the Executive Director of the Preservation Alliance, who twice told attendees at the Washington Square West Civic Association meeting on May 13th and at the PHC meeting on May 22nd, that the only time the PHC will be involved with property owners is when property owners would be required to apply for a permit, which is not correct for a variety of home improvements such as: painting the exterior of a property, and adding or replacing shutters, trim, storm doors, etc.,

I also support a hybrid meeting for maximum inclusivity, so that people can attend either physically or virtually, like the Philadelphia School Board's monthly meetings. Per our "right to gather" (Article 1 of the US Constitution), we request the "chat" option for the virtual meeting be turned on, so that attendees can communicate with one

another, as they would if they were meeting in person. On the same constitutional grounds, including transparency under the Pennsylvania Sunshine Act, we also request that we can see all those in attendance, virtually, who want to be seen.

I also support the Josh Zugerma's petition which outlines in detail the violations of PHC's own regulations with regards to the Wash West designation.

In addition, due to the misinformation in Inga Saffron's July 7th Philadelphia Inquirer article and a WSWCA FB page as well, I'm told, it would be unfair and unethical, as well as a further violation of the Sunshine Act, to hold the July 12th meeting regarding the historic designation of Wash West under such chaotic circumstances.

Oppose the creation of a Washington Square West Historic District

Andrea Chenier <r.andreachenier@gmail.com>

Thu 7/11/2024 10:22 AM

To: Jon Farnham <Jon.Farnham@phila.gov>

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Mr. Farnham,

I oppose the creation of a Washington Square West Historic District, although I fully support the destruction of buildings or areas or monuments of a truly historic nature. I also support the maintenance of such historic structures. I oppose the wholesale designation of the district for many reasons, only a few of which I will note here owing to time.

- 1.) The Historical Commission already has the authority to designate historic buildings, but many, if not most in the proposed district have little or no historic importance. The proposal seems to me to be a ruse to reduce work for the Commission in that they wouldn't have to study and designate individual structures.
- 2.) The procedures of the Historical Commission are complex, confusing, arcane, seemingly arbitrary, and sometimes over-rigidly enforced (I can cite one specific example with a neighbor).
- 3.) The designation of a historic district does not account for the problems it creates for two groups: the elderly and the socioeconomically disadvantaged. Neither group has the capacity to navigate the procedures. I have read through the requirements to submit a proposal for approval, and they are extensive and require documentation not readily available to homeowners, and/or would require additional expense. (I am an octogenarian, and have had one personal and very unpleasant interaction with the Historical Commission for what I thought was a simple inquiry. I am certain many on the Commission are well-meaning, and also understand anyone can have a bad day.)
- 4.) Some studies show the designation of historic districts lead to a reduction in diversity, despite the Commission's protestation to the contrary. This makes perfect sense given my comments immediately above: the disadvantaged and elderly simply cannot navigate the procedures and expenses.

5.) Having read some of the online minutes of the Commission, I am impressed with the lack of transparency of decisions.

To inform myself of the process and procedures, I have read through a number of documents, including: 1.) *CITY OF PHILADELPHIA HISTORIC PRESERVATION ORDINANCE, CHAPTER 14-1000 WITH PERTINENT EXCERPTS FROM OTHER SECTIONS OF THE ZONING CODE AS OF MAY 22, 2023*; 2.) *PHILADELPHIA HISTORICAL COMMISSION RULES & REGULATIONS*; 3.) *How to Navigate the Historical Review Process in Philadelphia: A Guide for Property Owners*.

I could describe additional objections to the creation of a historic district for Washington Square West, but given I learned only last evening of the opportunity to write, I thought it best to keep this relatively short and establish my opposition to the creation of the district.

Thank you for your consideration of my objections.

Richard A Brand
1224 Panama Street
Philadelphia, PA 19107

Washington Square West Historic Designation

Josh Angotti <angottijosh@gmail.com>

Wed 7/10/2024 9:24 PM

To: preservation <preservation@Phila.gov>

Cc: Jon Farnham <Jon.Farnham@phila.gov>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Could you please officially register my opposition to the Washington Square West Historic destination. I own 333-35 S 13th Street, Philadelphia, PA 19107 and i have diligently upgraded my property year after year despite the high cost of construction in Philadelphia. Designating my property as a historic building will further increase those costs and there is no way i will be able to continue maintaining the same upgrade schedule in the future.

I've spoken with someone at the Historic Commission and they were unable to explain the benefits of this designation to property owners or the city of Philadelphia. In which case this designation seems to be a solution in search of a problem. It will only hinder us as property owners and I don't want that to happen. Please don't move forward with this proposal.

Josh Angotti

571.332.0985

[Angottijosh@gmail.com](mailto:angottijosh@gmail.com)

Re: Opposition to the Proposed Washington Square West Historic District

Josh Zugerman <j.zugerman@gmail.com>

Thu 7/11/2024 8:19 AM

To: preservation <preservation@Phila.gov>

📎 1 attachments (396 KB)

7.11.2024 Opposition Letter re Proposed Washington Square West Historic District.pdf;

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Good morning Commissioners,

Attached please find an updated version of the letter I submitted on June 13, 2024. Note that the substance of the letter has not changed—it details the legal infirmities with the notice and, more importantly, the proposed designation itself, which does not satisfy the criteria laid out in the City of Philadelphia Historic Preservation Ordinance, Chapter 14004(1). To the extent that you, your staff, and/or the City's Law Department have already reviewed the June 13, 2024 letter, you need not reread this one.

Instead, the update is solely to reflect additional signatories, both from within and without the Washington Square West neighborhood, who, upon learning of the proposed designation, wished to register their staunch opposition. The signatories to this letter include both residents of the community as well as representatives for large groups of home and property owners (HAPCO, Alder Court Homeowners Association, Washington Mew Homeowners Association), showing that opposition to this designation is broad, and growing.

The fact that opposition has grown as time passes should make it clear that many people were unaware of the designation process due to a lack of proper notice, and are only learning about it from the efforts of their fellow neighbors. I imagine that, with more time, more opposition will surface. Further, to the extent the designation is approved, complaints from the public to the PHC and our elected officials will grow as people learn, for the first time, that their properties are subject to PHC oversight when they either have to seek permission to make cosmetic changes to their exteriors, or get sanctioned by the PHC for making such changes (such as painting, which would not require L&I involvement and thus no permits) without prior approval.

Due to the lack of the legally-required notice, I request that you continue the meeting until the PHC properly notices this issue to the community. I also respectfully request that, when you do appropriately agenda the designation issue, you vote to deny designation because the district does not meet the legal criteria, and instead continue the successful process of individual property designation that already governs more than half of our neighborhood.

Please consider this letter in your deliberations, and please include it, and this email, in the public record concerning this matter. Thank you for your time.

Josh Zugerman

409 S. Quince St.

On Thu, Jun 13, 2024 at 9:44 AM Josh Zugerman <j.zugerman@gmail.com> wrote:

Good morning Commissioners,

Attached please find a letter I co-authored and that has been signed by numerous residents of Washington Square West which sets for the legal and practical reasons we oppose the creation of the proposed Washington Square West Historic District.

As explained in greater detail in the letter, while certain properties within the district satisfy certain of the criteria laid out in City of Philadelphia Historic Preservation Ordinance, Chapter 14004(1), as is evident by the simple fact that more than half of the properties in the proposed district are already designated as historic, the proposed district as a whole does not satisfy the criteria.

Instead, this is simply an attempt to use the creation of an entire district to capture properties that would not otherwise qualify on their own. This was laid bare during the May 22, 2024, Meeting with the Committee on Historic Designation, when Mr. Bruce Laverty openly discussed how having a district, as opposed to individual designations, gives the PHC more authority to oversee what happens in the neighborhood. While the desire of Mr. Laverty, and others on the Committee, to vote to recommend expanding the PHC's powers is

understandable insofar as they want more control over what the residents of Philadelphia do with their property—it is not legal. Instead, the district must satisfy the criteria set forth in the Historic Preservation Ordinance which, as explained in the attached letter, the proposed district does not do.

I respectfully request that you consider this letter in your deliberations, and that it be included in the public record concerning this matter. Thank you for your consideration.

Josh Zugerman

409 S. Quince Street

Philadelphia Historical Commission
1515 Arch St., 13th Floor
Philadelphia, PA 19102
Preservation@phila.gov

July 11, 2024

Subject: Opposition to Proposed Washington Square West Historic District

Dear Commissioners,

We, the undersigned, are homeowners and residents in Washington Square West and are writing on behalf of ourselves, and many others in the neighborhood, to oppose the nomination to create the Washington Square West Historic District, as both legally deficient and fundamentally unnecessary.

Legally, the nomination should be rejected because (1) insufficient notice was provided to the affected neighborhood and (2) the neighborhood does not meet the criteria for historic designation, a fact tacitly acknowledged by the Committee on Historic Designation. To approve the designation despite these infirmities will invite litigation to challenge it as arbitrary, capricious, and an abuse of discretion, and may well engender challenges to the City of Philadelphia Historic Preservation Ordinance as impermissibly vague.¹ Instead, the designation should be rejected, and the practice of designating individual properties, as has worked for over half the proposed district, should continue as needed.

INADEQUATE NOTICE:

As you know, the City of Philadelphia Historic Preservation Ordinance, Chapter 14-1000 et seq. lays out the process under which the Philadelphia Historical Commission (“PHC”) may designate a property or district as historic and subject it to PHC oversight. Per Section 14-1004(2), when a district has been nominated, the PHC must, at least 60 days before holding a public meeting to consider the designation:

- (1) Send written notice of the proposed designation to the owners of each building, structure, site or object within the proposed district. The notice shall indicate the date, time, and place of the public meeting at which the Historical Commission will consider the proposed designation;
- (2) Publish notice of the proposed designation of a district as historic in a newspaper having general circulation within the City; and
- (3) Post notice of the proposed designation at locations within the proposed district.

Regarding written notice, there are at least some residents that did not receive any such notices. By way of example, the residents of 1-13 Alder Court never received the written notices that their properties were going to be included in the district. There are likely others that never received written notice and are unaware that their properties are now subject to PHC oversight and may be permanently subject to such oversight if the nomination is approved. After

¹ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

corresponding with Mr. Farnham of the Historic Commission, the Commission does not appear to be able to verify that the 5500+ letters were all sent out and appropriate notice was provided to the property owners.

This issue is further compounded by the failure to publish the proposed designation in a newspaper having general circulation within the City. To satisfy this requirement, the PHC, through the City's Procurement Department published a notice on Page 10 of the March 22, 2024 edition of the *Philadelphia Daily News*. While historically the Philadelphia Daily News was a widely read local newspaper alongside the Philadelphia Inquirer, that cannot be said anymore. The Philadelphia Daily News barely exists, having been subsumed by the Philadelphia Inquirer, a paper that the PHC could have opted to provide notice in, but did not. In short, the Philadelphia Daily News is not a newspaper having general circulation within the city, let alone in Washington Square West.

Finally, the PHC did not provide sufficient posting of notices within the district. On request, the PHC provided pictures of four posts, (at 8th and Pine, 11th and Pine, 12th and Spruce, and 13th and Locust). The boundary of the proposed district extends in some places north of Walnut and all the way down to South St. Four posts scattered along Locust, Spruce, and Pine streets is woefully insufficient to notify all those affected, especially in light of the failure to publish the notice in the Philadelphia Inquirer and to ensure that all those affected received written notice.

The need for proper notice cannot be overstated. The Nominators and their members and supports have had literally years to organize this effort to nominate the neighborhood, but for those of us who just live here, we only found out when we received the letters in March, and only if we actually received those letters. Thus the supporters are organized and have had ample time to marshal their efforts to push this through, while the many of us who are opposed have had to spread the word about what the Nominators and the PHC are trying to do. The failure to properly notify the neighborhood about the nomination compounds the unfairness of the entire process.

In short, due process requires that the PHC comply with the notice provisions laid out above, and which have not actually been met. For those reasons alone, we ask that you reject the nomination or, at a minimum, postpone it to allow the PHC to fully comply with Section 14-1004(2).

FAILURE TO SATISFY THE DESIGNATION CRITERIA:

Even if the PHC had satisfied the notice requirements of Section 14-1004(2), which it did not, the designation should still be rejected for failure to satisfy the criteria for historic designation.

Section 14-1004(1) lays out the criteria for designation. In the nomination application, the Washington Square West Civic Association and the Preservation Alliance for Greater Philadelphia (the "Nominators") claim that the district satisfied subsections (a), (c), (e), (f), (i), and (j).

Section 14-1004(1)(a)

Section 14-1004(1)(a) requires the district to have “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 support this, the Nominators note that the district is a gathering place for Philadelphia’s LGBTQ+ community, its role in the growth of the City’s Black community, and “for its significant value as representative of an important period in the development of the City: in its close juxtaposition of buildings of different historic uses and buildings and streetscapes of different scales, it reflects the period of the city’s development in which Philadelphians of different means and race travelled on foot between residence, work, and community, religious, healthcare, and social organizations and institutions.”

On the first two points, the Nominators only identified five properties as having a link to LGBTQ+ history² and five linked to the Black community,³ and one linked to both communities.⁴ Of those eleven properties, three are already designated. The undersigned take no issue with individually designating the other eight as historically significant, as has been done in the past in Washington Square West, with more than half of the buildings therein being designated. However, the need to protect these eight properties hardly justifies creating a historic district covering 1,441.

On the third point, almost every neighborhood, if not every neighborhood, in Philadelphia would satisfy such a vague claim as a juxtaposition of buildings and different historic uses, different streetscapes, etc. It’s intentionally vague and entirely meaningless. Suffice to say, the district as a whole does not satisfy subsection (a), and to conclude that it did in contravention of the facts would be an abuse of discretion.⁵

Section 14-1004(1)(c)

Section 14-1004(1)(c) requires the district to “[r]eflect[] the environment in an era characterized by a distinctive architectural style.” To satisfy this claim, the Nominators claim that the district contains examples of Federal, Second Empire, late nineteenth- and twentieth-century Revival styles, Greek Revival, Philadelphia’s modernist styles. In other words, the district is not characterized by a distinctive architectural style, but rather contains numerous, individual buildings (many of them already designated as historic) that are from different architectural styles. As said before, even if there are individual building that meet the requirement of subsection (c) that are not currently designated, then such buildings can be designated under this provision. To use a provision that asks about a single distinctive architectural style to designate

² 1116 Walnut St.; 345 S. 12th St.; 205 S. 13th St.; 261 S. 13th St.; and 1003 Spruce St. (Designated in 1958).

³ 1000-42 Lombard Street (currently Seger Park, which is undergoing work on its playground equipment, presumably with PHC approval); 1200-10 Lombard St. (Designated in 1984); 310-12 Quince St. (Designated in 1961); 409-15 S. 11th St.; and 254 S. 12th St.

⁴ 1125-35 Walnut St.

⁵ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

an entire neighborhood that contains many styles and also includes properties that lack any buildings (parking lots and many playgrounds) and thus have no architectural style, is simply overreach. It is clear the district as a whole does not satisfy subsection (c), and to conclude that it did in contravention of the facts would be an abuse of discretion.⁶

Section 14-1004(1)(e)

Section 14-1004(1)(e) requires the district to be “the work of a designer, architect, landscape architect or designer, or professional engineer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or nation” As with subsection (c), the Nominators rely on the district containing some individual buildings that are “important examples of designs by professional architects whose work has significantly influenced the cultural development of the City and beyond.” The Nominators then reference two such architects—“Robert Mills (1781-1855), whose early and representative work on the Franklin and Carolina Rows mark the beginning of a nationally significant career, to that of Oscar Stonorov (1905-1970), represented in the District by Casa Fermi at 1300 Lombard Street.” In the nomination, only one property attributed to Oscar Stonorov,⁷ and only five properties attributed to Robert Mills,⁸ all of which are already registered as historic, and thus do not need district-wide encirclement to protect them.

As with subsection (c), that some of individual buildings in the district are the work of a “designer, architect, landscape architect or designer, or professional engineer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or nation” hardly satisfies the criteria for designating an entire neighborhood of over 1,400 properties that were the work of multiple designers, architects landscape architects or designers, or professional engineers. Further, in many cases, the designers, architects landscape architects or designers, or professional engineers who made the properties were not those whose work “significantly influenced the historical, architectural, economic, social, or cultural development of the City, Commonwealth, or nation,” are entirely unknown,⁹ or are parking lots. Suffice it to say, the district as a whole does not satisfy subsection (e), and to conclude that it did in contravention of the facts would be an abuse of discretion.¹⁰

Section 14-1004(f)

Section 14-1004(f) requires that the district “[c]ontain[] elements of design, detail, materials, or craftsmanship that represent a significant innovation.” To satisfy this claim, the Nominators claim that Washington Square West should be designated because it contains rowhomes (a feature that exists throughout the entire city) and that it is this neighborhood that set the pattern for rowhomes throughout the city. The Nominators even acknowledge that the first recorded

⁶ *Id.*

⁷ 1300-28 Lombard St.

⁸ 923, 929, 931, and 933 Spruce St., and 234-36 S. 8th St.

⁹ By way of example only, in the Nomination the Nominators failed to identify the architect or builder of the properties at 409, 411, 413, 415, 417, and 419 S. Quince St.

¹⁰ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

group of row homes was Budd’s Row, constructed in 1691 in Old City—not Washington Square West. Further, this type of home was used through the early development of the city, including in what is currently Old City, Society Hill, Rittenhouse Square, and Fidler Square. Further, even if the rowhomes in Washington Square West set the pattern for those that followed, that does not warrant designating the entire neighborhood as historic but rather the earlier rowhomes, which are likely already protected as part of the 53% of the neighborhood that is already designated. To capture the entire neighborhood, which includes rowhomes built long after the pattern for Philadelphia was set,¹¹ homes that are not rowhomes such as high-rise apartment buildings and standalone homes,¹² businesses, parking lots, and playgrounds. It is yet another example of the Nominators attempting to use a select number of buildings that may satisfy one of the criteria, in this case subsection (f) and using it to capture the entire neighborhood. It is simply overreach. Washington Square West, as a whole, does not satisfy subsection (f), and to conclude that it did in contravention of the facts would be an abuse of discretion.¹³

Section 14-1004(i)

Section 14-1004(i) requires the district to have “yielded, or may be likely to yield, information important in pre-history or history.” The Nominators claim that Washington Square West includes multiple lots that have not seen extensive subsurface disturbances since the removal of buildings constructed before the 20th century, and these subsurface lots are likely to yield important information. The Nominators specifically identify only St. Thomas at 203-209 S. 12th Street as an example.

First, it should be noted that 203 S. 12th St. is already designated as historic, and nothing prevents 205, 207, and 209 S. 12th St. from also being designated, which is true for any lot that can be presently identified as being the site of some significant historical structure or event. Second, to the extent the Nominators are focused solely on vacant lots (such as parking lots) under subsection (i), this demonstrate that they cannot use this subsection to capture the entire neighborhood but rather only its vacant lots. In other words, whatever the PHC decides as to the parking lots the Nominators want to designate, subsection (i) cannot be used to justify the designation of lots with structures on top of them—i.e., the vast majority of the proposed district.

It should be noted that, at the request of constituents, the staff of the PHC reassessed the Nominator’s claims about the vacant lots and parking lots they wished to place under PHC oversight as contributing properties, finding that the Nominators had failed to meet their burden as to 19 out of the 21 lots they included in the nomination. In other words, over 90% of the properties the Nominators sought to classify as contributing under subsection (i), upon a second look, failed to meet the criteria. It should also be noted that during the May 22, 2024, meeting, several of the Committee members on the Committee on Historic Designation spoke at length about the need to protect parking lots—totally ignoring the actual criteria set forth by the Nominators.

¹¹ By way of example only, 409, 411, 413, 415, 417, and 419 S. Quince St. were all built in 1963 per the Nomination.

¹² By way of example only, 1225 Waverly St.

¹³ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

We ask that the same reexamination that the PHC was apparently willing to take on behalf commercial parking lots be applied to the properties of homeowners who live in the proposed district who don't individually have the means to challenge the overreach the Nominators ask the PHC to engage in as do the commercial interests to which the PHC has already conceded.

Finally, if the Nominators pivot to claim that any property in the district, beyond vacant lots, could yield information important to pre-history or history, then the provision has lost any possible limitation, as there are properties like that in every neighborhood of Philadelphia—one may as well declare the entire City a historic district.¹⁴ Once again, even if there are select properties that would satisfy subsection (i), and which are not currently designated, nothing stops someone from nominating that particular property. To seek to apply subsection (i) to the entire neighborhood would be twisting the purpose of the provision well beyond its scope and, would be an abuse of discretion.¹⁵

Section 14-1004(j)

Section 14-1004(j) requires that the district exemplify “the cultural, political, economic, social, or historical heritage of the community.” The Nominators claim that the proposed district satisfies subsection (j) because it is the “location of important aspects of the lives of European immigrants to the City in the period of its substantial growth and development of the District between the early nineteenth and early twentieth centuries.”

It borders on the nonsensical to identify an entire neighborhood and then claim that the neighborhood should be a historic district because the neighborhood exemplifies the “cultural, political, economic, social, or historical heritage of the community.” Of course it does. Every neighborhood perfectly exemplifies the cultural, political, economic, social, or historical heritage of neighborhood—how could it not, when you've captured the entire community as part of the subsection. To read subsection (j) to allow one to capture an entire neighborhood renders it limitless. Instead, subsection (j) should be read to ask whether a particular property or group of properties within a larger community exemplifies that community. The nomination's inventory does not cite a single specific property that supports subsection (j). A reader is left to wonder for themselves what buildings (or parking lots) should be preserved to “lives of European immigrants”. Since the nomination is for the entire district, it cannot satisfy subsection (j).

Even if one considered the Nominator's particular claim, it should still fail. Here the Nominators attempt to use a fact that applies to multiple neighborhoods in Philadelphia, and in this case that applies to most cities on the Eastern Seaboard of the United States. European immigrants moved to many Philadelphia neighborhoods in the early 1800s and 1900s—not just Washington Square West. If the presence of important aspects of the lives of European immigrants into the City warrants the designation of the entire neighborhood—as opposed to actually identifying which properties within the neighborhood were the important aspects, there really is no limit to the

¹⁴ If subsection (i) can be used to capture an entire area because some of the properties may yield information important in pre-history or history, then there is no logical reason that such a claim could not be made for the entire city or any subsection thereunder. Find one property in Northeast Philadelphia that satisfies subsection (i) and designate the entire portion of the city.

¹⁵ See A Manual for Pennsylvania Historical Architectural Review Boards and Historical Commissions at 53.

subsection. Further, in relying on the neighborhood having important aspects of European immigrants, the Nominators fail to recognize that subsection (j) requires that the district “exemplify the cultural, political, economic, social, or historical heritage of the community”—meaning the Washington Square West community. Our community is not just European immigrants and those descended from them but rather a wildly diverse community that has members from all over the world. To designate the entire district because Europeans settled here is misguided at best. Suffice it to say, the district does not satisfy subsection (j), and to find otherwise would be an abuse of discretion.¹⁶

Lack of Specificity

The nomination, as presented, lacks any structure to hold it together and justify the designation of the district. Six criteria are cited for the district, none of which could accurately be applied to the entire nominated district. At best each criterion applies to small portions or individual structures in the district.

The nomination then states a “Period of Significance” from 1740 to 1985, a span of 245 years of history, encompassing periods prior to the founding of our country (and less than 60 years after the founding of Philadelphia itself) up to the beginning of construction of One Liberty Place. This period is only justified by book-ends, “the establishment of Mikveh Israel Cemetery in 1740 . . . until the solidification of Washington Square West as a LGBTQ+ community.” No justification is given for the intervening years. The criteria for designation require specificity. An “event”, an “environment”, an “architectural style”, a “designer”, a “significant innovation”, a “motif”. What this nomination lays out is a mix of general statements, mixed together to try to justify a district without any unifying characteristic or theme based on a buffet of criteria.

When the reader continues to the property inventory, the factual basis to justify the designation is missing. Most properties have a bare bones description of the property and a picture. Some even lack the picture because they are not visible from the right of way. Explanations of how a property supports designation under criteria A, C, E, F, I or J are rare. Classifications of properties as Contributing or Non-Contributing are mostly done without explanation. This leaves the nomination without a firm footing in facts to justify designating 1441 properties. Nowhere does the nominating document explain the borders of the district, how the individual properties in the district support the given justifications, why individual properties are classified as contributing/non-contributing, or the actual historical significance of most buildings. For the commission to allow such a weak nomination to proceed, that makes general statements about pieces of a district, then uses them to justify designating a much broader area, without sufficient documentation at the property level would be an abuse of discretion, and would invite a challenge to the law itself and the way it is applied for impermissible vagueness.

¹⁶ *Id.*

CONCLUSION:

As is discussed above, the district as a whole does not satisfy any of the selected criteria, and should be rejected. Opting to designate despite these infirmities would require the PHC to ignore the limits placed in the City of Philadelphia Historic Preservation Ordinance, and would invite legal action to overturn the decision and possible to find the statute void for vagueness if it can be applied in such a manner.

This is especially true when, per the nomination, 53% of the properties in the district are already designated. What legal justification could there possibly be to designate the remaining 47% when it is clear that the truly historic have already been designated, and any truly historic properties that somehow remain outside the PHC's jurisdiction can still be individually designated.¹⁷ The only possible justification would be extra-legal—an attempt to exercise oversight over properties that do not warrant it.

This desire was made clear during the May 22, 2024, Meeting with the Committee on Historic Designation. During that meeting, after numerous residents objected to the designation of the entire neighborhood, the members of the Committee discussed the proposal. During that discussion, Mr. Bruce Laverty openly discussed how he was struck by the loss of Jewelers Row and that he was shocked that it hadn't already been designated, and stated that “at the very least, what a historic district as opposed to an individual historic nomination does is it gives us some, some stakes, to put down, and say, if there's gonna be a demolition or if there's gonna be some major change, let's look at this twice, as [sic] opposed to, finding out the hard way how, you know, how could how could we lose this.”

As should be obvious, Mr. Laverty said the quiet part out loud.¹⁸ Designating the entire district solely in order to be able to control what happens in it is not at all what the City of Philadelphia Historic Preservation Ordinance allows. Should the PHC take the same perspective as Mr. Laverty and designate the district in spite of it not satisfying, as a whole, the criteria laid out in Section 14-1004(1), would constitute an abuse of discretion.

¹⁷ The currently undesignated properties are frequently unremarkable buildings from the past 50 years, new builds (some still under construction), and the aforementioned “historic” parking lots and playgrounds.

¹⁸ One of the Committee members, Elizabeth Milroy, even expressed that designation would be a “wonderful way for property owners to learn about where they live” and that residents would be “able to consult the staff of the historical commission.” As should be clear, the City of Philadelphia Historic Preservation Ordinance does not allow the PHC to designate a neighborhood because it patronizingly wishes for its residents to learn more about their history and to come to the PHC as a resource.

In sum, we ask that the Philadelphia Historic Commission reject the proposed Washington Square West Historic District and to continue to allow the current process of individual designation to continue in our neighborhood.

Respectfully submitted,



Joshua Zugergerman
409 S. Quince Street



Jonathan Hessney
President Alder Court HOA
9 Alder Court

<u>/s/ Shahrukh Tarapore</u> Shahrukh Tarapore President, Washington Mews Home Owners Association 11th & Lombard Sts.	<u>/s/ Mantreh Atashband</u> Mantreh Atashband 1110 Lombard Street	<u>/s/ Kevin Hoekzema</u> Kevin Hoekzema 825 Lombard Street	<u>/s/ Colin Flannery</u> Colin Flannery 1031 Spruce Street, Unit 105
<u>/s/ Eleanor Wilner</u> Eleanor Wilner 324 S. 12th Street	<u>/s/ Leonard A Shatz</u> Leonard A Shatz 2 Alder Court	<u>/s/ Andrea Korb</u> Andrea Korb 1119 Lombard Street	<u>/s/ Zachary Bloom</u> Zachary Bloom 1035 Lombard Street, #13
<u>/s/ Susan Levesque</u> Susan Levesque 1035 Lombard Street 5 Alder Court	<u>/s/ Fareeha Arshad</u> Fareeha Arshad 417 S. Quince Street	<u>/s/ Stephanie Lai</u> Stephanie Lai 9 Alder Court	<u>/s/ derek levesque</u> derek levesque 1035 Lombard Street, # 5
<u>/s/ Caroline Shatz</u> Caroline Shatz 1027 Waverly Street	<u>/s/ Joshua Dillard</u> Joshua Dillard 1033 Spruce Street, Apt 101	<u>/s/ Benjamin Honig</u> Benjamin Honig 416 S. 10th Street	<u>/s/ Eric Bause</u> Eric Bause 1203 Lombard Street
<u>/s/ Dana Ovadia</u> Dana Ovadia 416 S. 10th Street	<u>/s/ Jonathan Cooper</u> Jonathan Cooper 424 S. 11th Street	<u>/s/ Vaidehi Mehta</u> Vaidehi Mehta 1124 1/2 Lombard Street	<u>/s/ Richards & Patricia Jarden</u> Richards & Patricia Jarden 7 Alder Court
<u>/s/ Abbie Dillard</u> Abbie Dillard 1033 Spruce Street, Unit 101	<u>/s/ Eileen Harris</u> Eileen Harris 424 S. 11th Street	<u>/s/ Lisa Belisonzi</u> Lisa Belisonzi 263 S. 9th Street, Apt 3F	<u>/s/ Lauren Sinnenberg</u> Lauren Sinnenberg 1022 Addison Street

<u>/s/ Colin Murphy</u> Colin Murphy 1317 Rodman Street	<u>/s/ Richard Brome</u> Richard Brome 1210 Pine Street	<u>/s/ Paul Lorenz</u> Paul Lorenz 250 S. 13th Street	<u>/s/ Joe Pileri</u> Joe Pileri 323 S. Camac Street
<u>/s/ Amanda Mott</u> Amanda Mott 1205 Pine Street	<u>/s/ Jerry Ratcliffe</u> Jerry Ratcliffe 1321 Rodman Street, #3B	<u>/s/ Matthew Kaganovich</u> Matthew Kaganovich 1100 Spruce Street, Apt. 1A	<u>/s/ Pauli Hicks</u> Pauli Hicks 412 S. 11 Street
<u>/s/ Kathleen Garriss</u> Kathleen Garriss 412 S. 11th Street	<u>/s/ Matt Genstein</u> Matt Genstein 1007 Lombard Street	<u>/s/ Kevin Ryan</u> Kevin Ryan 1317-21 Rodman Street, Apt 3A	<u>/s/ Francine Sandrow</u> Francine Sandrow 825 Lombard street
<u>/s/ Raven Rimerman</u> Raven Rimerman 206 S. 13th Street, Apt. 404	<u>/s/ Carl Lysaght</u> Carl Lysaght 1026 Pine Street, #7	<u>/s/ Elisabeth Morlino</u> Elisabeth Morlino 1317-1321 Rodman Street, Unit 3C	<u>/s/ Chris DiCicco</u> Chris DiCicco 1215 Spruce Street, #301
<u>/s/ Alice Goffman</u> Alice Goffman 409 S. Quince Street	<u>/s/ Daniel Zahn</u> Dr. Daniel Zahn 1041 Lombard Street	<u>/s/ Micaela Segura Arias</u> Micaela Segura Arias 1041 Lombard Street	<u>/s/ Philippe Met (and Yue Zhuo)</u> Philippe Met (and Yue Zhuo) 1026 Waverly St
<u>/s/ Joni Baumgarten</u> Joni Baumgarten 1212 Lantern Square	<u>/s/ Miguel Mostafa</u> Miguel Mostafa 420 S. 11th Street	<u>/s/ Todd Pitock</u> Todd Pitock 318 S. 12th Street	<u>/s/ Jay Ifert</u> Jay Ifert 419 S. 13th Street
<u>/s/ Hayden Mink</u> Hayden Mink 728 S. Broad Street	<u>/s/ Kevin Curran</u> Kevin Curran 1035 Lombard Street	<u>/s/ Jack Schonewolf</u> Jack Schonewolf 250 S. 13th Street, Apt. 9B	<u>/s/ Ann Marie Dimino</u> Ann Marie Dimino 1035 Lombard Street
<u>/s/ Jared Sobel</u> Jared Sobel 1317-21 Rodman Street Unit 2C	<u>/s/ Samantha Snyder</u> Dr. Samantha Snyder 1321 Rodman Street	<u>/s/ Caleb Holtmeyer</u> Caleb Holtmeyer 1001 Vine Street, Apt. 1108	<u>/s/ Lynn Landes</u> Lynn Landes Co-Founder of The Philadelphia Society of Small Streets 217 S. Jessup Street

<u>/s/ Joshua Angotti</u> Joshua Angotti 333-35 S. 13th Street	<u>/s/ Melissa Skolnick</u> Melissa Skolnick 423 S. Jessup Street	<u>/s/ Maureen M. Gavin</u> Maureen M. Gavin 404 S. Quince Street	<u>/s/ Robert Miller</u> Robert Miller 1113 Lombard Street
<u>/s/ Robert Weinberg</u> Dr. Robert Weinberg 324 S.12th Street	<u>/s/ Jeremy Pitock</u> Jeremy Pitock 318 S. 12th Street	<u>/s/ Toni Pitock</u> Toni Pitock 318 S. 12th Street	<u>/s/ Nathan Pitock</u> Nathan Pitock 318 S. 12th Street
<u>/s/ Frazar Thomas</u> Frazar Thomas 1205 Waverly Walk	<u>/s/ Colin Murphy</u> Colin Murphy 1317 Rodman Street	<u>/s/ Clifford Landes</u> Clifford Landes 217 S. Jessup Street	<u>/s/ Min Fei Huang</u> Min Fei Huang 246 S. 11th Street
<u>/s/ Alex Clark</u> Alex Clark 1109 N. 3rd Street	<u>/s/ C. Thames</u> C. Thames 1035 Lombard Street	<u>/s/ Greg Wertman</u> Greg Wertman President- Hapco Philadelphia 8 Penn Center, 1628 JFK Blvd, Lower Level C-12	<u>/s/ Neil Harrison</u> Neil Harrison 1116 Waverly Street
<u>/s/ Charlie Bell</u> Charlie Bell 1213 Walnut Street	<u>/s/ Roc Armenter</u> Roc Armenter 411 S. Jessup Street	<u>/s/ Patricia Flis</u> Patricia Flis 411 S. Jessup Street	<u>/s/ Alexander Milone</u> Alexander Milone 1347 S Bouvier Street

Continuance Request on Washington Square West Historic Designation & Request for Hybrid Meeting Format

Colin Murphy <colin.murphy1865@gmail.com>

Wed 7/10/2024 7:59 PM

To: preservation <preservation@Phila.gov>

Cc: Renee Garcia <Renee.Garcia@Phila.gov>; Lydia Furst <Lydia.Furst@Phila.gov>; Lewis Rosman <Lewis.Rosman@Phila.gov>; Mark Squilla <Mark.Squilla@Phila.gov>; Kenyatta Johnson <Kenyatta.Johnson@Phila.gov>; Jon Farnham <Jon.Farnham@phila.gov>

 1 attachments (26 KB)

Petition for Continuance and Hybrid Discussion on Wash West Historic District.docx;

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Dear Philadelphia Historical Commission,

We, the undersigned on this petition, request a continuance on the discussion in regards to the nomination of the Washington Square West Historic District until the September 13th, 2024 meeting. In addition to a continuance, we are requesting the meeting format to be hybrid, allowing for an in-person element similar to how the Philadelphia School Board conducts their meetings currently.

Please confirm receipt of this email with the petition attached. I request that this email and petition is registered on the official PHC website under the "Designation matters under review" section.

Best regards,

Colin Murphy
President, 1317-21 Rodman Street HOA

July 10th, 2024

Subject: Continuance of Discussion on Wash West Historic District and Hybrid Meeting Request

We, the undersigned, PETITION the Philadelphia Historical Commission's (PHC) to continue the proposed Historic Designation of Washington Square West until September 2024, for the following reasons:

1. July and August are vacation months, and it is likely that considerably more people will be able to attend the PHC meeting in September.
2. The fact that not all affected Washington Square West property owners, such as the Alder Court Homeowners Association and The South Jessup Street Parking Lot Association, were informed of the designation.
3. Nor were most property owners notified nor invited to participate in the serious talks which reportedly commenced three years ago between PHC, Wash West Civic, and The Preservation Alliance about this historic designation.
4. Due to the broad impact and serious legal nature of the proposed historic designation, which could be considered a "taking" of sorts, and includes increased costs for home improvements and repairs, as well as the increased cost and/or availability of homeowners insurance, which have not been adequately addressed in PHC's online information, as of yet.
5. Noting that the PHC's 'restrictions on' and 'options for' property owners under a historic designation continue to be extremely vague, and in many cases non-existent, such that until those restrictions and options are clarified, the public will be unable to make reasonably "informed" public comments in support of, or opposition to, this designation.
6. Recognizing that the criteria for qualifying for the designation is so broad and vague as to encompass a 300-year span, purportedly ending in the 1980's, which essentially could be used to co-opt the property rights of property owners anywhere in Philadelphia.
7. In concern over misstatements by the Executive Director of the Preservation Alliance, who twice told attendees at the Washington Square West Civic Association meeting on May 13th and at the PHC meeting on May 22nd, that the only time the PHC will be involved with property owners is when property owners would be required to apply for a permit anyway, which is not correct for a variety home improvements such as: painting the exterior of a property, and adding or replacing shutters, trim, storm doors, etc.,

Therefore, we, the undersigned, per the spirit and intent of the Pennsylvania Sunshine Act, hereby request a continuance of the Washington Square West Historical Designation from July to September 2024 to discuss our above concerns.

We also request a hybrid meeting for maximum inclusivity, so that people can attend either physically or virtually, like the Philadelphia School Board's monthly meetings. Per our "right to gather" (Article 1 of the US Constitution), we request the "chat" option for the virtual meeting be turned on, so that attendees can communicate with one another, as they would if they were meeting in person. On the same constitutional grounds, including transparency under the

Pennsylvania Sunshine Act, we also request that we can see all those in attendance, virtually, who want to be seen. Thank you for your consideration.

Respectfully,

Colin Murphy
President 1317-21 Rodman Street HOA
1317 Rodman Street

<u>/s/ Fareeha Arshad</u> 417 S. Quince Street	<u>/s/ Caleb Holtmeyer</u> 1001 Vine Street, Apt 1108	<u>/s/ Eric Bause</u> 1203 Lombard Street
<u>/s/ Jared Sobel</u> 1317-21 Rodman Street, Unit 2C	<u>/s/ Kevin Ryan</u> 1317-21 Rodman Street, Unit 3B	<u>/s/ Lynn Landes</u> 217 South Jessup Street
<u>/s/ Kaitlin Bitting</u> 1317-21 Rodman Street, Unit 2B	<u>/s/ Joshua Angotti</u> 333-35 S 13th St.	<u>/s/ Jonathan Hessney</u> 9 Alder Ct
<u>/s/ Andrea Korb</u> 1119 Lombard Street	<u>/s/ Greg Hardes</u> 1119 Lombard Street	<u>/s/ Patrick Kocks</u> 219 S. Jessup Street
<u>/s/ Glen Quigley</u> 808 Addison Street	<u>/s/ Tom Smitley</u> 401 S. 11th Street	<u>/s/ Bill Babiash</u> 309 South Camac Street
<u>/s/ Toni Pitock</u> 318 S. 12th Street	<u>/s/ Michele Fiedler</u> 1214 Spruce Street, #5	<u>/s/ Lisa B Caruso</u> 310 South 12th Street
<u>/s/ Jennifer B. Rosen</u> 308 South Fawn Street	<u>/s/ Joanie Madalone Yelon</u> 905 Lombard Street	<u>/s/ Robert Miller</u> 1113 Lombard Street

<u>/s/ Brian</u> 1027 Lombard Street	<u>/s/ Christian Uruburo</u> 1212 Spruce Street, Apt 2F	<u>/s/ John Costo</u> 306 S. Fawn Street
<u>/s/ Mary Belair</u> 1204 Spruce Street	<u>/s/ Karl Krumholtz</u> 325 South Camac Street	<u>/s/ Todd Pitock</u> 318 S 12th Street
<u>/s/ G Daughety</u> 1135 Waverly Street	<u>/s/ Maureen M. Gavin</u> 404 South Quince Street	<u>/s/ Steven R. Sell</u> 1211 Lombard Street
<u>/s/ Matt Graham</u> 1207 Lombard Street	<u>/s/ Diane Walsh</u> 1134 Waverly Street, FRT	<u>/s/ Kevin Hoekzema</u> 825 Lombard Street
<u>/s/ Joshua Zugeran</u> 409 S. Quince Street	<u>/s/ Amanda Mott</u> 1205 Pine Street	<u>/s/ Georgia Faino</u> 1315 Irving Street
<u>/s/ Vincent Faino</u> 1315 Irving Street	<u>/s/ Carl Lysaght</u> 1026 Pine Street, #7	<u>/s/ Colin Murphy</u> 1317-21 Rodman Street, Unit 2A

Proposed Washington Square West Historic District

volm matthew <mattvvv@gmail.com>

Thu 7/11/2024 8:45 AM

To: preservation <preservation@Phila.gov>

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Dear Sirs,

I am writing in support of the proposed Washington Square West Historic District. I was very happy to learn that the Designations Committee recommended the designation at its meeting in May.

I live at 311 S. Fawn St. in a house that was built in 1875 and is located in the proposed district. Almost all of the houses on my block are already designated historic buildings, but for some reason my house and several others on the block were never designated. I would like to see our entire block protected, so I strongly support the proposed Washington Square West Historic District.

I think historic preservation is much more meaningful and effective when it is applied to an entire neighborhood rather than piecemeal to individual properties. It only takes one property owner making irredeemable changes to an unprotected parcel to undermine the historical nature of a block. Historic preservation should be a community effort aimed at preserving the unique historical character of a whole neighborhood, not just selected buildings.

Neighborhood based preservation is especially important in a city like Philadelphia, where strong neighborhoods and rich history are keys to the city's culture.

The success of the Rittenhouse and Society Hill historical preservation districts strongly suggests that Washington Square West will also thrive with a historic district designation.

I hope the Historical Commission votes this week to give final approval to the Washington Square West Historic District.

Thank you for your consideration.

Matthew Volm
311 S. Fawn St.
Philadelphia, PA

Please reschedule the July 12th Meeting for Washington Square West Historical Designation

georgiarae809@aol.com <georgiarae809@aol.com>

Thu 7/11/2024 11:51 AM

To:preservation <preservation@Phila.gov>;Mark Squilla <Mark.Squilla@Phila.gov>;Paul Steinke <psteinke@preservationalliance.com>;Jon Farnham <Jon.Farnham@phila.gov>
Cc:Vincent Faino <vfaino@aol.com>

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We are against the blanket historical designation of Washington Square West and please consider the July 12th meeting for the reasons below.

Although, we feel there are restrictions needed in our community, however the blanket historical designation of Washington Square West is too severe and not enough public participation/meetings were held for the property owners. We feel we have no voice and more time is needed for the commission to speak with the property owners.

This is a very large designated nomination, meant to stop and or dissuade future growth and seal the neighborhood in time. One public meeting on zoom with the Historical Commission should not qualify for you to move so quickly to a vote of this magnitude.

We have attended and or re-watched all of the Civic and zoom meetings held on this subject. We listened closely to speakers from the Historical Commission and the Preservation Alliance. It appears that a major factor driving the Commission and Alliance towards the blanket designation is the demolition of the 12th St Gym. A sentiment of "we don't want what happened to our gym to happen again in our community" was expressed more than once. We understand and emphasize with that sentiment, yet have we gone to far?

We are sure that our Civic board, has worked very hard to get this designation for our community. Yet, we did not attempt to include the entire community, and especially every property owner from the outset. Attendance at our Civic meetings is sparse, and only a small amount of members tuned in to the meetings in 2021. No public comments were allowed at that and attendees had to type questions to the Civic and they were passed on with no feedback. Most of the community was left in the dark from that point, until we received a six page notice from the city on what we are not allowed to do with our properties moving forward.

The Civic board member who nominated our Community now feels differently about this designation. She commented that the rules are a bit rigid and there should be some changes to the potential blanket designation and not every property should be treated the same. We agree with her. We don't need 6 pages of restrictions ... lets work towards one page.

Our house on Irving St. is considered significant. I can agree that the front facade of our house is significant, as are most in Wash West. That was one of the reason we purchased the house. What I can not agree to is the Historical Commission having total control over our entire property. Our house was greatly modified by the previous owners and the only piece of

history left is the facade. For that reason we are against having our property designated historical at this time.

Let's take our time and schedule more meetings. Please reschedule the planned July 12th meeting and arrange for additional in-person meetings after vacation season and on days and times that will ensure meaningful attendance.

Thank you for your consideration.

Sincerely,

Georgia Faino
1315 Irving Street

Wash West for historical designation or move the July 12th meeting into the future sixty days, ninety days or indefinitely so you can schedule more meetings so all voices can be heard.

We do not want our property designated historic as do many other property owners in Wash West.

Re: En Masse Historical Designation of Washington Square West

vfaino@aol.com <vfaino@aol.com>

Thu 7/11/2024 11:55 AM

To: psteinke@preservationalliance.com <psteinke@preservationalliance.com>; Mark Squilla <Mark.Squilla@Phila.gov>; Jon Farnham <Jon.Farnham@phila.gov>; Anne Kelly <Anne.Kelly@phila.gov>; preservation <preservation@Phila.gov>
Cc: Georgia Faino <georgiarae809@aol.com>

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Hello everyone:

Please make certain that this entire email chain is part of the public record.

We are following up on our most recent reply to your comments below in the hope that we can keep the discussion going. No matter the rationale put forward by some, an historic designation of 1400 properties is a significant and unprecedented overreach by the Historical Commission and its impact should be studied and evaluated by organizations other than the Commission. The Commission's focus is on their own criterion for such designations and not on the longer-term social and economic impact of their actions on the community at large over decades to come.

On a personal note, Georgia and I would challenge the classification of our property as significant, for the simple reason that the third story addition was built in 2006 which alters the building extensively.

Thanks,

Vincent and Georgia Faino
1315 Irving Street

[Sent from the all new AOL app for iOS](#)

On Thursday, June 27, 2024, 5:46 AM, vfaino@aol.com <vfaino@aol.com> wrote:

Hi Paul,

Sorry, I somehow missed your email address even though the email below was meant for you.

----- Forwarded Message -----

From: vfaino@aol.com <vfaino@aol.com>
To: Mark Squilla <mark.squilla@phila.gov>; Jon Farnham <jon.farnham@phila.gov>; Anne Kelly <anne.kelly@phila.gov>; Preservation <preservation@phila.gov>
Cc: Georgia Faino <georgiarae809@aol.com>
Sent: Wednesday, June 26, 2024 at 09:01:30 PM EDT
Subject: Re: En Masse Historical Designation of Washington Square West

Hi Paul,

Thank you for your reply. We appreciate the dialogue and the article. From our perspective and from what we have read, the 12th Street Gym was in need of multiple repairs, many of which were identified by the city and unfortunately the owner did not

have the funds to invest in the improvements. Is that brief summary accurate? Perhaps, it was just the right time for the owner to sell at a meaningful gain and enjoy his retirement. If "stronger historic designation" could now prevent any owner, in a similar situation as Frank Baer from selling, that would be patently unfair.

I concur that there is plenty of room to grow in our city, that can include the further development of vertical buildings, but that will no longer be the case *here* in Wash West. As far as impact studies, although they are not required, our elected officials can and should request them prior to the implementation of this historic designation. Painting with such a broad brush while not conducting impact studies simply doesn't add up.

Best regards,

Vincent and Georgia Faino
1315 Irving Street

On Friday, June 14, 2024 at 12:57:26 PM EDT, georgiarae809@aol.com <georgiarae809@aol.com> wrote:

----- Forwarded Message -----

From: Paul Steinke <psteinke@preservationalliance.com>
To: vfaino@aol.com <vfaino@aol.com>; Mark Squilla <mark.squilla@phila.gov>
Cc: preservation <preservation@phila.gov>; Georgiarae809@aol.com <georgiarae809@aol.com>; Jon Farnham <jon.farnham@phila.gov>; Anne Kelly <anne.kelly@phila.gov>
Sent: Thursday, June 13, 2024, 07:02:52 PM EDT
Subject: RE: En Masse Historical Designation of Washington Square West

Dear Mr. and Mrs. Faino,

Thanks for asking such reasonable questions.

1. Impact studies are not required by Philadelphia's historic preservation ordinance.
2. "Seamlessly blending the old and new" is certainly possible and in fact is happening all over Center City. The new apartment building at 12th & Sansom, new townhouses at 11th & Manning and the Laurel near Rittenhouse Square are recent examples . What historic designation does is protect the structures that give a neighborhood its unique, pleasing and historic character, while allowing new construction to occur at parcels that do not contribute to that character.
3. I guarantee you that all the global cities you mention have historic preservation regulations very similar to ours (if not stricter) that protect their historic structures and streetscapes.
 - According to this article, Amsterdam, one of my favorite cities, has 9,000 national and municipal monuments and six protected conservation areas, including the city center. Does our historic city center deserve anything less?
<https://www.amsterdam.nl/en/policy/policy-culture-arts/listed-monuments/>

4. In my view, the destruction of the 12th Street Gym complex, and the loss of two historic buildings at 11th & Walnut (not the Wendy's!) are good examples of why stronger historic preservation regulation is needed in Washington Square West.
5. Keep in mind that your neighbors to the east and west -- Society Hill and Rittenhouse Square -- have been thriving with historic districts in place for 25-30 years.
6. Philadelphia has plenty of space to grow and build tall. This city had 2 million people in 1960, half a million more than we have today. There's *plenty* of room within our city boundaries to build and expand our tax base.
7. In any other city, a neighborhood with historic and cultural character like Washington Square West would have been listed as a municipal historic district long ago. In fact, the neighborhood was first nominated in 2011. Tomorrow it may finally get its due as a Philadelphia historic district. We certainly hope so.

Paul Steinke

Executive Director

Preservation Alliance for Greater Philadelphia

1608 Walnut Street, Suite 1702

Philadelphia, PA 19103

(215) 546-1146 ext. 1

www.preservationalliance.com

From: vfaino@aol.com <vfaino@aol.com>

Sent: Thursday, June 13, 2024 6:05 PM

To: Mark Squilla <mark.squilla@phila.gov>

Cc: preservation <preservation@phila.gov>; Georgiarae809@aol.com; Jon Farnham <jon.farnham@phila.gov>; Paul Steinke <psteinke@preservationalliance.com>; Anne Kelly <anne.kelly@phila.gov>

Subject: Re: En Masse Historical Designation of Washington Square West

Hi Mark, Jon Paul, and Anne

Mark,

Thank you for your response to our email. Yet, no one has addressed our concerns relating to what may be the lack of impact studies. Has any person or organization studied what such a significant historic designation may do to our collective ability to develop parcels of land where multiple soon to be historic properties sit? Well placed vertical buildings, especially those that host residents and commercial businesses, drive density, tax revenue, vitality, and commerce.

What impact will this action have on our tax base? Tempering the ability of the community to benefit from adding some modern homes and commercial buildings into Wash West's existing landscape over the coming decades, may place a higher tax

burden on the existing homeowners. And, as you know, many residents of our community believe that one of the main reasons this broad action took place was the demolition of the 12th Street Gym. In your view, is there validity to that belief?

As we mentioned below, so many world class cities like London, Amsterdam, Buenos Aires, and Tokyo for example promote downtown development that seamlessly blends the old with the new. What happens when the pace of new, modern energy efficient buildings and homes slows to a trickle in Wash West? Why elect to include many properties?

Please address these specific questions and concerns. Thank you.

Best regards,

Vince and Georgia Faino

1315 Irving Street

[Sent from the all new AOL app for iOS](#)

On Thursday, June 6, 2024, 11:28 PM, Mark Squilla <Mark.Squilla@Phila.gov> wrote:

Vincent & Georgia

Thank you for reaching out and we received several other concerns. We reached out to the Preservation Alliance and below was their explanation:

Sincerely
Mark

The Washington Square West [historic district nomination](#) was sponsored by Washington Square West Civic Association and the Preservation Alliance for Greater Philadelphia, not by the Historical Commission.

The Historical Commission is empowered by the city's [historic preservation ordinance](#) to determine whether such a nomination is worthy of approval. The Commission is made up of [13 members](#) appointed by the Mayor. Under the ordinance, City Council gets one seat out of the 13.

A few helpful facts about what historic designation means to a property owner.

1. Historic designation only applies to the exterior portions of a building that are visible to the public.
2. It only kicks in when a property owner applies for a building permit for exterior work.
3. The staff of the Historical Commission conducts an initial review of the application. They approve 95% of the applications they receive in 1-3 business days.
4. Once designated, property owners are under *no obligation* to do anything to their properties.
5. The value of historic district status to a community is mainly to prevent demolition of historic properties and to prevent insensitive alterations from being made to them. We've all seen the horrors that can happen to beautiful historic structures that make our city so lovely and unique. The Historical Commission is there to help make sure that doesn't happen.

Given the above, the vast majority of homeowners within a historic district *will never have to deal* with the Historical Commission.

The Preservation Alliance has a [Guide to Navigating the Historical Review Process](#) on our website.

The Historical Commission is empowered by the city's [historic preservation ordinance](#) to determine whether such a nomination is worthy of approval. The Commission is made up of [13 members](#) appointed by the Mayor. Under the ordinance, City Council gets one seat out of the 13.

As you know, the city's laws are enacted by our democratically elected representatives. The historic preservation ordinance is no exception. Our city's system of municipal historic preservation can be found in many other cities across the country.

It's also worth noting that the neighborhoods on either side of WashWest - Society Hill and Rittenhouse-Fitler - have been historic districts since the 1990s. And both neighborhoods are thriving – as is WashWest. Becoming a historic district won't change that. How do I know? Because of the lived experience of Society Hill and Rittenhouse-Fitler. In fact, I would argue that being a historic district has made them *stronger* by helping to protect their essential historic character, which contributes so much to their enduring appeal as places to live. It's past time that WashWest joins them as a historic district.

Hope this is helpful. Please feel free to call if you have any further questions. I'm sure Jon Farnham, executive director of the Historical Commission, would also be happy to answer any questions you might have.

Councilmember Mark Squilla
1st District City Council
City of Philadelphia
332 City Hall
Philadelphia, PA 19107
p. 215-686-3458
f. 215-686-1931
e. Mark.Squilla@Phila.Gov

From: yfaino@aol.com <yfaino@aol.com>
Sent: Thursday, June 6, 2024 7:19:00 PM
To: Mark Squilla <Mark.Squilla@Phila.gov>
Cc: preservation <preservation@Phila.gov>; Georgjarac809@aol.com
<Georgjarac809@aol.com>
Subject: Fw: En Masse Historical Designation of Washington Square West

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Hi Mark,

Georgia and I were unable to participate in the the Historical Commission's Advisory Committee's public meeting held on May 22nd. Yet we did have an opportunity to listen to the replay a couple of nights ago in its entirety. It was quite evident that the decision by the Advisory Committee to recommend to the Historical Commission, that the process should move forward had already been made and the historical designation of a troublesome number of properties would soon be finalized. Yet, there was no discussion or recognition of the longer term impact of the decision upon Washington Square West as a community. It just seems that the Commission's main focus is on their own established criterion as though that criterion is without flaws of any kind.

Please consider that once almost all of Washington Square West is so designated that future real estate development within our neighborhood is essentially halted. We will no longer have an opportunity to benefit from additional

population density. And in a very real sense, our tax base will eventually shrink and those taxpayers that own property in the community, will take on more and more of the tax burden because of what will surely be a lack vertical building projects.

It appears that the demolition of the 12th Street Gym is a driving force behind the far reaching en masse designation of Washington Square West as historical. Members of the Historical Commission, the Historical Commission's Advisory Committee and several members of the Wash West Civic made numerous public statements to that effect. Many of us in the neighborhood did not want to see the mural of Gloria Caseraz destroyed, yet view the new building as a source of tax revenue and of new energy while adding consumers to our population that will support all local businesses for decades.

World class cities somehow protect their existing significant architecture yet seamlessly blend the old with the new through focused legislation and dialogue that protects the public interest. We are relying on a "stroke of the pen" mentality instead. Hopefully, we have asked to commence third-party impact studies that look well out into the future and that consider the longer term impacts of what we are about to finalize.

Thank you,

Vincent and Georgia Faino
1315 Irving Street