



July 2, 2015

Jonathan Farnham, Ph.D.  
Philadelphia Historical Commission  
Room 576  
City Hall  
Philadelphia, PA 19107

Re: Loews Hotel Philadelphia (PSFS Building), 1200 Market Street, Philadelphia, PA

Dear Dr. Farnham:

We are in receipt of the minutes from the May 26, 2015 Architectural Committee meeting reflecting the committee's decision to recommend denial of the applicant's request to replace the existing, largely non-functioning, neon components of the PSFS Building rooftop sign with LED lighting.

The minutes confirm the committee's recommendation of denial pursuant to Standard 6 [Secretary of the Interior's (SOI) Standards], following staff recommendation.

Standard 6 states, "Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new features shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by commentary, physical, or pictorial evidence."

As you are aware, the Secretary of the Interior's *Standards for Rehabilitation* does not prohibit the replacement of features that are missing or damaged, even if those features are determined to be character-defining. By nature the term, "rehabilitation," assumes that some level of repair or alteration will be required in order to provide for adaptive reuse. The Secretary of the Interior's *Standards for Rehabilitation: Guidelines for Rehabilitating Historic Buildings (Guidelines)*, the official publication on the Standards, provides guidance on how the Standards are to be applied in evaluating projects, and includes provisions for replacement as a viable option. Immediately prior to the listing of the ten Standards, it is stated, "The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility." This statement conveys the Secretary of the Interior's intent that economic and technical feasibility should be taken into consideration when applying the Standards to projects.

The Guidelines detail a hierarchy of treatments: Protect and Maintain (Preserve), Repair and Replace. The section on Replace states, "Guidance is provided for replacing an

entire character-defining feature with new material because the level of deterioration or damage of materials precludes repair...the preferred option is always replacement of the entire feature in kind, that is with the same material. Because this approach may not always be technically or economically feasible, provisions are made to consider the use of a compatible substitute material.”

In our submission to the Architectural Committee, evidence was presented that the PSFS sign no longer functions as originally designed. The original paired neon strands have not functioned for the past 15 years. The sign’s components have become unreliable and it is common for entire sections of the letters to be non-functioning. The sign can no longer be safely or satisfactorily maintained due to technical limitations with replacing neon and the economic inefficiencies of maintaining neon on a sign of this scale. The economic and technical infeasibility was cited as the primary reason that the applicant can no longer retain the current sign and why replacement with modern LED technology is the only practical solution for the sign to remain lit.

The National Park Service has published extensive guidance on interpreting the SOI Standards in evaluating proposed treatments. Preservation Brief 16, “The Use of Substitute Materials on Historic Building Exteriors,” is most relevant in considering the proposed replacement of the neon with LED technology.

Preservation Brief 16 discusses the fact that the practice of using substitute materials in architecture is not new, rather it follows a centuries-long tradition of using more cost-effective and common materials in imitation of more expensive and less available materials. A wide range of examples are cited from George Washington’s use of sand-impregnated paint over wood to resemble ashlar stone, to terra cotta, which itself was a substitute material popular in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries to simulate the appearance of carved stone. Similarly, ornamental window hoods, traditionally made of carved wood or stone, began to be manufactured in cast iron as a more economical solution and in the early 20<sup>th</sup> century, sheet metal ornamental window hoods became standard in Philadelphia’s housing stock. In more recent decades, the aluminum window industry has advanced its products and aluminum replacement windows are commonly approved by the National Park Service on projects where original wood windows or steel windows have deteriorated to a point where retention is not feasible. Likewise, glass fiber reinforced concrete has become a commonly approved substitute for deteriorated terra cotta ornamentation.

As outlined in Preservation Brief 16, The National Park Service proposes four circumstances that warrant the consideration of substitute materials:

- 1) The unavailability of historic materials;
- 2) The unavailability of skilled craftsmen;
- 3) Inherent flaws in the original materials;
- 4) Code-required changes.

**Unavailability of Material:** As evidenced by the information provided by Philadelphia Sign Company in its written and verbal testimony, neon has become increasingly difficult to obtain with lead times extending weeks or even months. As a result, sections of letters remain dark for extended periods, which reflects poorly on Loews in spite of their 15-year accommodation in maintaining this important icon for the city.

**Unavailability of Skilled Craftsmen:** As confirmed by the testimony of Philadelphia Sign Company, with each passing year the availability of skilled neon technicians declines. As the number of surviving neon signs continues to diminish, the serviceability will become even more problematic.

**Inherent Flaws in Materials:** The use of neon in a sign of this size and location is an inherently flawed design concept. Unlike the more ubiquitous neon art signs, typically found on the lower stories of commercial buildings, the sheer size of the PSFS sign, with letters rising nearly three stories at a height of over 30-stories, provides insurmountable challenges in maintaining continuously lit conditions. Storms, wind, and flying debris regularly shatter the glass tubes and damage the wiring.

**Code-Required Changes:** Even the most routine maintenance required to service the sign poses issues with respect to electrical and life safety codes. The existing electrical system in place regularly shorts when workers are making repairs, presenting a hazard for technicians. Additionally, routine service calls present significant safety issues given the location and design of the sign. The west-facing sign in particular poses a challenge in that it aligns with the exterior wall plane, making it difficult to safely erect scaffolding. Further, the design of the sign did not provide for adequate tie-offs, presenting safety challenges during service calls. Installing a new LED system would most certainly reduce the number of service calls, thus reducing risks currently posed to technicians. In its guidance, the NPS conveys flexibility in this area acknowledging that substitution materials may be selected to accommodate “a reduced need of maintenance” or similarly that “the feature being replaced is relatively inaccessible for routine maintenance.”

It is apparent that the proposed PSFS sign alteration fulfills the four circumstances that the NPS has determined warrant the use of substitute materials.

In selecting appropriate substitute materials, the NPS offers three criteria for the consideration of substitute materials:

- 1) Must be compatible with historic materials in appearance;
- 2) Physical properties must be similar to those of the historic materials or be installed in a manner that tolerates differences;
- 3) Must meet certain basic performance expectations over an extended period of time.

**Compatible in Appearance:** NPS guidance establishes parameters for assessing replacement materials; the closer an element is to the viewer, the more closely the material and craftsmanship must match the original. Therein the NPS acknowledges

greater flexibility when assessing mock-ups from a distance. The appropriate vantage point for assessing the PSFS mock-up is from the public right-of-ways. The mock-up that has been in place and continuously lit since the first week of May provides visual evidence that the LED mock-up cannot be readily distinguished from the extant sign components. At night or during the day, from the public right of way, it is simply impossible to tell the difference between the mockup and the existing sign.

**Physical Properties:** Guidance provided in Preservation Brief 16 cites that it is essential that where substitute materials do not match the physical properties of the historic, that the new system should be designed to be compatible and avoid damage to the historic materials; with special care taken to integrate and anchor the new materials properly. As illustrated in the drawings prepared by Philadelphia Sign Company, the LED system has been designed so that minimal anchoring into the extant metal channel letters will be required. The impact on the channel letters has been minimized to the greatest extent possible.

**Performance Expectations:** NPS guidance dictates that the selection of substitute materials should seek to utilize materials that have long-term performance and durability characteristics. Philadelphia Sign Company has provided evidence that confirms that a new LED system would achieve exceedingly higher performance standards than the existing or a new neon system. The extreme weather conditions found on the roof of this 30+ story building are not conducive to exposed glass tubing, whether historic or new.

Preservation Brief 16 states that if “reasonable options for repair or replacement in kind have been exhausted, the choice among a wide variety of substitute materials currently on the market must be made.” It is further stated that “in the event that the replacement is necessary, the new materials should match the material being replaced in composition, design, color, texture, and other visual properties.” The in-situ mock-up provides the evidence that the LED will most certainly match the essential visual properties and thus should be considered an acceptable substitute material.

The Brief concludes, “the importance of matching the appearance and physical properties of historic materials, and, thus of finding a successful longterm [sic] solution cannot be overstated.”

A second NPS publication specifically addresses historic signs – *Preservation Brief 25 – The Preservation of Historic Signs*.

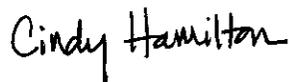
Preservation Brief 25 discusses the importance of historic signs, but recognizes that “historic signs pose problems for those who would save them.” The nature of signs as ever-changing artifacts is also addressed citing changes to accommodate changing uses, changing ownership, changing tenants, changing trends in architecture, as well as changing technology. One notable example of a significant rooftop sign change occurred in 2014, when the New York Landmarks Preservation Commission approved the removal of the neon GE sign atop the GE/RCA Building in New York City for the installation of the LED Comcast sign. The NPS acknowledges in Preservation Brief 25 that retention in

situ is not always possible and alternatives are suggested such as: relocating signs to the interior, modifying the sign, donating the sign to a local museum. The NPS demonstrates flexibility in their approach to retaining historic signs and offers reasonable alternative approaches.

In summary, significant evidence has been presented that demonstrates that the conditions of deterioration are such that retention of the existing neon is no longer feasible. Additionally, materials have been submitted that make the case for replacement with LED to achieve desired cost savings, reduce safety risks for the sign technicians, and align with Loew's green initiative, which is central to their corporate philosophy and aligns with the City of Philadelphia's energy benchmarking policy. Most importantly, the mock-up that has been in place for the past month illustrates that the LED lighting system closely matches the neon and is visually indistinguishable. The NPS guidance discussed herein demonstrates the intent of the application of the Secretary of the Interior's Standards, which are intended to be applied with reasonableness, taking economic and technical feasibility into account. We believe that replacement utilizing an LED lighting system should be an approvable change in applying the Secretary of the Interior's Standards to the proposed work.

Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cindy Hamilton". The signature is written in a cursive, slightly slanted style.

Cindy Hamilton  
Vice President

cc: Danny Smith / Loews Hotels