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February 24, 2021

Via E-mail

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

Re: Pending Nomination of 1106-14 Spring Garden Street (the "Property")

Dear Dr. Farnham:

As you know, we represent the owner of the Property, Mapleville, LLC. On December 11, 2020, the Historical Commission voted to rescind the Property from the Philadelphia Register of Historic Places due to lack of proper notice of the original nomination to the property owner, and remand the consideration of the Property's nomination to the Committee on Historic Designation.

In anticipation of the Committee on Historic Designation's review of the nomination at its March 3, 2021 meeting, we submit the attached report prepared by Civic Visions, LP (the "Report") regarding the substantially demolished building on the Property. The Report is directly relevant to the Committee on Historic Designation's review as the staff recommendation provides that the Property "satisfies Criteria for Designation C and D."

As detailed in the Report, the now substantially demolished building is situated in an area which lacks a particular identity or character, as required by Criterion C. Rather, "the only dominant style of the vicinity is developer row blocks, contemporary apartment buildings, and empty properties and parking lots." Report at page 3. Likewise, while Criterion D requires that a building embody distinguishing characteristics of a style, the substantially demolished building on the Property "is something of a hybrid . . . most of which is not Colonial Revival." Report at page 7.

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We look forward to presenting to the Designation Commission and the full Commission.
Please let us know if you have any questions or require further information.

Very truly yours,

/s/ Matthew N. McClure

Matthew N. McClure

MNM/mpg
Enclosure

Cc: Dina Bleckman, Esq.

Inappropriateness of Designation of 1106-1114 Spring Garden Street

Prepared for:
Matthew McClure
Ballard Spahr

Prepared by:
CivicVisions, LP
George E. Thomas, Ph.D. member

2.23.2021

1106-14 Spring Garden Street does not merit designation on the basis of Criteria C and D

The nomination for 1106-14 Spring Garden Street ignored the nearly total demolition of the adjacent neighborhood that makes the use of Criterion C inappropriate. Nor does the nomination prove the applicability of Criterion D for this building as exemplary of the Colonial Revival style. Criterion C requires a neighborhood to have a particular identity or character to which the building refers; Criterion D requires that a building embodies distinguishing characteristics of a style.

As stated in the nomination, the nomination was not about the value of the building to Philadelphia in accordance with the regulations of the Philadelphia Historical Commission, but instead was an attempt to stop a development project that was already well underway.

- By the time that the nomination was filed in 2017, 1106-14 Spring Garden Street had been vacant and unheated for 15 years, and now, four years later, it has been vacant for 19 years.
- Permits for extensive site demolition had been applied for beginning in 2013 and continuing into 2015: (Permits 547386, Zoning appeal, Nov. 2013, #21538, Demolition permit, 15 January 2015, #567835; Building permit, May 27, 2015, #582235).
- Demolition work affecting the rear of the site and well into the front block of the building was underway in 2015.
- By then, two years before the present nomination, architectural plans had been completed and elevation drawings were published (*Hidden City* August 31, 2015).
- At the time that the present nomination was filed, there was published information about a second round of proposed work (*OCF Realty* December 19, 2017) that marked significant additional investment in the site because its owners had concluded that the prior project, a three-story enlargement on top of the original building was unfeasible.
- Instead per the December 19, 2017 report the building would be demolished and a new building constructed on the site.
- Both of these projects were known in publications, and, coupled with the extensive investment and ongoing project detailed below should have caused the Historical Commission to reject the nomination.

Beyond the project history and the issues cited above, the building is of such minor historical and architectural character and the neighborhood has been so massively altered as to have no cohesiveness and as a consequence represents no particular era. Therefore the nomination should not have been accepted by the commission or approved by the Designation Committee and later by the full Commission.

- The nomination itself, as noted in the brief record of the hearing of the Designation Committee is dotted with errors of terminology, grammar, spelling and was so clearly a rush job that the nomination's inadequacies were called out by the Designation Committee. Nonetheless, the nomination was accepted.

Factual errors in the nomination:

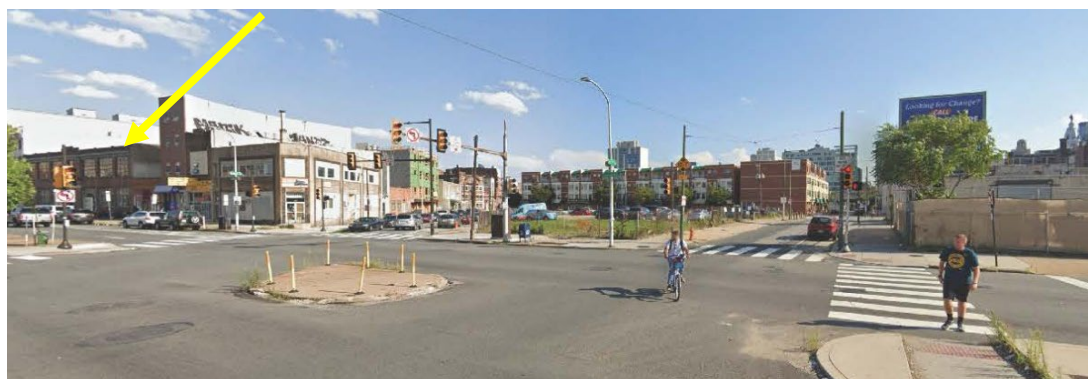
The nomination is in error in the front matter in stating that the building is merely in poor condition when it is in fact, as noted in the description in the 9 March 2018 Commission hearing it was “a shell” with the rear demolished and open to weather. Further as has been clear since 2007, as evidenced in Google Street View, the front façade has been significantly damaged by weathering of the structural steel in the basement windows that has jacked the façade and cracked its walls in every structural bay. It would have been more accurate to state that the building was either a ruin or a demolition site, given the state of its rear façade and boarded up front windows.

Nomination does not prove either criteria:

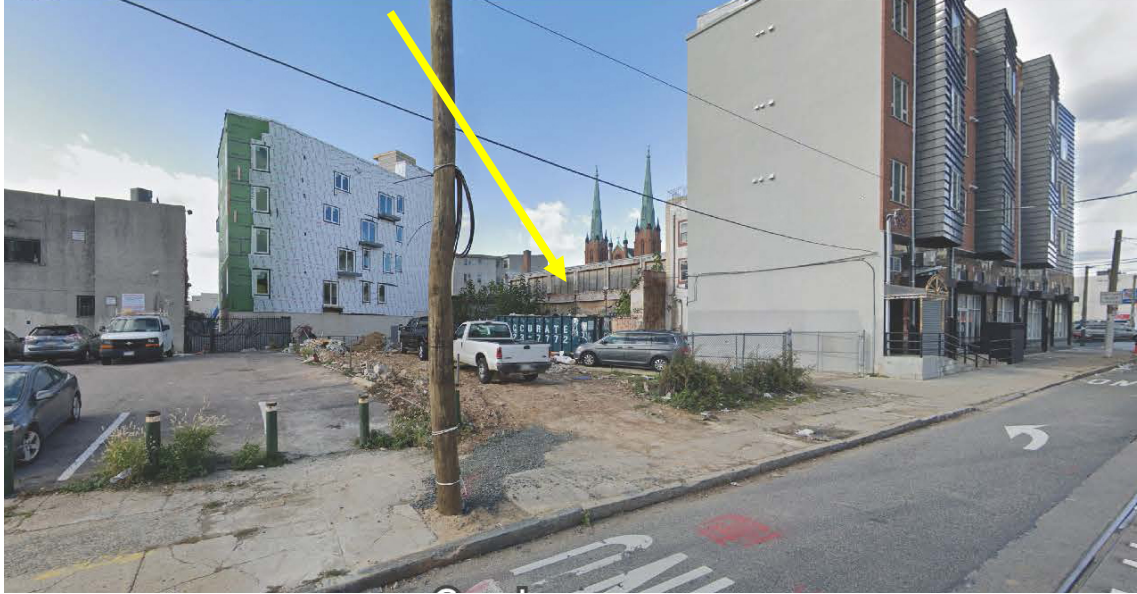
Most telling about the lack of significance of the building are the minimal criteria proposed for designation namely C. and D. which argue that the environment / neighborhood has a distinctive character that the building supports and further that the building has distinguishing features of its style. The PHC criteria call for more than just having a style but instead requires superlatives, in this case a “distinctive” era and “distinguishing” characteristics of the style. As will be apparent in the following review, neither superlative is met.

Criterion C: “Reflects the environment in an era characterized by a distinctive architectural style”

The nomination makes no attempt to explain how the building’s environment meets Criterion C. Indeed, this criterion is minimally addressed in the nomination with but one other photograph of a badly altered building in the neighborhood. No examination is offered of the drastic changes to the region in the last generation. This criterion should have been removed by the Designation Committee and the full Commission. The reason that no argument was made in the nomination for this criterion is clear from the context which is largely demolished with a mixture of vacant parking lots, new construction, and a few significantly altered and insignificant buildings. The visual evidence of the site makes clear that Criterion C is not met in that the only dominant style of the vicinity is developer row blocks, contemporary apartment buildings, and empty properties and parking lots.

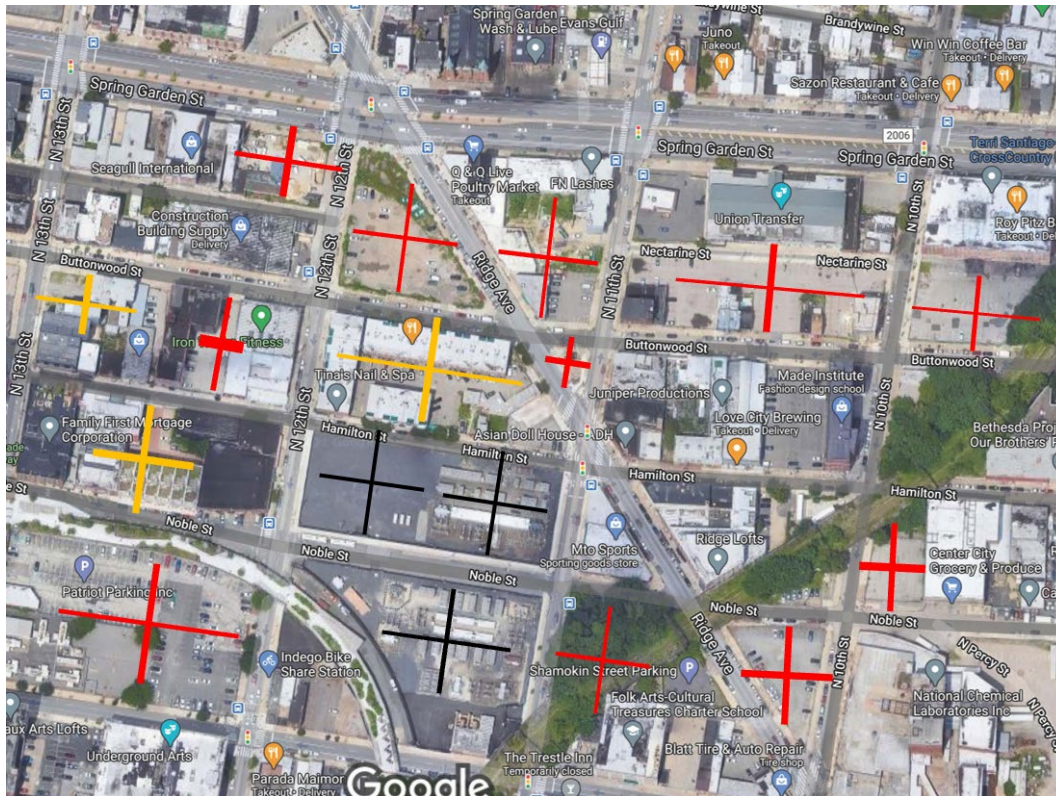


View of site (yellow arrow) from NW with rows of new houses, contemporary apartment buildings, vacant lots, and badly altered buildings: Google Street View 2019



Context from SE, immediate block with demolished rear (yellow arrow), new building at 11th and Spring Garden (right) and building under construction, Ridge Avenue, (center left) with parking lots for remainder of block.

Conclusion: Given the reality of the conditions of the site, the extent of recent demolition and the fragmentary and badly altered nature of the remaining buildings in the vicinity, the environment in the vicinity of 1106-14 Spring Garden street does not possess a distinctive architectural style and Criterion C does not apply.



2021 Google Earth view of site: red, vacant and parking; black, power grid; yellow, recent construction; a few one and two story much-altered buildings (not marked)

Criterion D: (d) Embodies distinguishing characteristics of an architectural style or engineering specimen

Using a numerical feature list approach to architectural styles ignores the reality that architectural styles are complicated creations that are identified through broad sets of relationships rather than individual disconnected details. In fact, nearly every feature of the list of characteristics cited in the nomination for the style can be found to not occur in actual Colonial Revival buildings.

- For example, Flemish bond brickwork is used on a modern lab building at Penn but the building is a modern industrial laboratory.



Flemish bond brick panels University of Pennsylvania Chemistry Building, Ballinger Co. and H2L2, 1969-73

Equally telling the most prominent features of the façade of 1104-16 are not part of the Colonial Revival style including:

- the broad banks of industrial windows; - *these are not the triple windows claimed*



- the rolled sheet metal cornice at the top of the façade; *this is not a dentilled cornice*



- the Prairie Style panels flanking the door and spandrel panels set off with header courses and accented at the corners with the small blocks of cast stone, etc, are in keeping with modern styles rather than the Colonial Revival; *these are not pendants*



Copper cornice, banks of industrial sash, moderne paneling, soldier course brick spanning window openings – none of these features are Colonial Revival

- the use of soldier courses concealing steel lintels spanning window openings instead of jack arches is not Colonial Revival
- The presence of loading docks on either side of the front door is not a Colonial Revival characteristic.

This is an industrial building with commercial style details that are not Colonial Revival.

Just because a building is built of brick with a rounded arched-headed door and light-hued masonry accents does not mean that it is Colonial Revival in style. These same features and materials might equally represent a mid-nineteenth century Italianate townhouse row on Delancey Street.



1800 block, Delancey Street, round headed doors with light stone trim; rehabbed art deco (gray) – none colonial revival

In short, the façade of 1106-14 Spring Garden Street is something of a hybrid with a little of this and a little of that, most of which is not Colonial Revival. The building at 1106-14 Spring Garden Street should not be designated for such minimal qualities that do not reach the standard required of distinguishing characteristics for an individually listed building.

Colonial Revival Commercial Buildings in Philadelphia:

Architecturally, there are numerous convincing commercial examples of the Colonial Revival style throughout Philadelphia, many constructed leading up to the Sesquicentennial Celebration. These are usually richly and consistently detailed, sometimes with reference to specific Philadelphia sources. Good examples include the Farm Journal Building (1913, Bunting & Shrigley) on Washington Square, with its richly carved pedimented doorway and detailed brick façade or the Provident Trust Company offices at 17th and Chestnut Streets (Rankin & Kellogg, 1926) with its references to Christ Church for the board room on the top story and Independence Hall in the detailing of the banking room.



Farm Journal Building, Athenaeum Collection



Provident Trust Co, Jas. L. Dillon, Athenaeum

Significant Colonial Revival style industrial buildings were used for printing plants in the downtown including the Curtis Publishing Company (Edgar V. Seeler, 1910-21) and the Public Ledger newspaper factory (Horace Trumbauer, 1924) opposite Independence Hall that were styled to relate to their context.



Curtis Publishing offices and printing plant, 1910



Public Ledger, offices and printing plant, 1924

Comparative Examples:

Of the examples cited in the nomination few if any rise to a level of significance that would merit an individual listing – and many of those cited would be intrusions in a district.

- The 8th and Locust commercial building is a 1950s or '60s redo of a 1921 industrial building probably influenced in its rehab by the Society Hill project. At that time oversized colonial doorways were added that covered earlier architectural elements and are not in keeping with the original façade (Elgin Development 8th and Locust, 1920, Leroy Rothschild, Newspapers.Com).



1987 photo, Bernie Cleff, (Athenaeum of Philadelphia), 8th and Locust Street, east and south facades, showing industrial glass block and doors on east façade with banks of sash added on south façade– with dropped ceilings.

- Others examples cited are generally in entirely different styles such as the offices for the Arguto Oilless Bearing Co. which is actually an Arts & Crafts rather than

Colonial Revival style (Mellor & Meigs, 1912, see bracket-supported canopy over door, casement windows and asymmetry).



Mellor & Meigs, Arguto Building, 1912 – Arts & Crafts canopy over door, casement windows, strong asymmetry (Athenaeum, Mellor & Meigs Collection)

- The Crescent Iron Works (Philip Johnson, 1928, Clio Index 0022424) also is not Colonial Revival, referencing instead other moderne styles, here the 1914 Traymore Hotel in Atlantic City with the yellow Traymore brick and moderne tapered capitals.



Crescent Iron Works, 4905 Grays Avenue with yellow Traymore sand-textured brick, moderne ornament

- Similarly, the Norton & Co. Building (1928 Ballinger) is clearly moderne in its soldier courses spanning windows, modern capitals and decorative brick work.



Ballinger & Co. Norton & Co. 3209 Woodland Avenue (1929)

- The example at 2905 N. 16th Street undermines the argument being nothing more than a box with the little colonial door and a fanlight ornament on the gabled brick wall at 2905 N. 16th Street. This building is clearly recent – well after the last Sanborn Atlas of 1951 which shows a five-story reinforced concrete building on the site and would not meet the PHC requirements.



Unknown architect, c. 1970. 2905 N. 16th Street

Conclusion: The nomination fails to properly evaluate or compare the building at 1106-1114 Spring Garden Street with effective examples of the Colonial Revival Style.

- As a result, the nomination does not demonstrate that the building is a good example showing the distinctive traits of the style.
- The nomination should have been rejected on the basis of the style narrative for Criterion D, for its lack of knowledge about the style on which the nomination is entirely based, and for its failure to choose examples that meet any standard for design.

- A fan-lighted door and keystones above the door in a field of non-Colonial Revival features do not make a Colonial Revival building of such import as to warrant designation.

Failure of the nomination to accurately present the information in the photographs:

Apart from the failure of the nomination to culturally or historically situate the building in the critical contexts of neighborhood and architectural history, there is an extraordinary lack of understanding the meaning of the visual evidence of the building. The nominator failed to read the evidence of the photographic documentation:

- The façade photographs make clear the extent of damage to the Spring Garden Street façade that should have raised questions about the suitability of the building for designation. In those photographs, window sills are significantly out of alignment; basement window heads are clearly damaged with extensive rust jacking of basement window lintels, and with a bit of care, it can be seen that the spandrels are bowing out as well.



Façade looking west showing sills raised out of position and major cracking of spandrels caused by rust jacking of the basement windows

- A comparison with the historic 1940s photograph below shows that all of these elements were straight – so the changes represent physical deterioration of the façade caused by rusting of the steel lintels that have jacked the entire façade out of plane.



Left: steel lintel above window jacked out of position; right: soldier course pushed out of plane to left of window



1106-14 Spring Garden in 1949; window sills flat, no distortion or evidence of obvious problems (Free Library of Philadelphia)

- A look at the façade just since the beginning of Google Street View in 2007 shows the accelerating rate of change.

Inability to distinguish building materials.

- The inability of the nominator to distinguish building materials should have been red flags for the Designation Committee and the full historical Commission.
- For example the question raised in the nomination about the type of masonry that made up the cornice is revealing. The shaped material is uniform green which should have suggested that it is made of sheet copper.
- A closer examination finds screws or rivets holding the sheets of copper together – and a casual look at the end of the façade finds jagged, torn edges where drain lines were pulled out. It should have been obvious that the cornice is made of sheet copper – and has nothing to do with Colonial Revival. This is more a moderne element than a Colonial Revival feature.



Left: sheet copper cornice (not stone) riveted together; end of copper cornice showing torn end where drain line removed – obviously metal. Not stone.

- Similarly the light hued masonry units (many of them improperly named) are cast stone with a quartz aggregate -which is perfectly clear when examined closely on site.
- It looks as if the entire nomination was done from afar using other people's photographs, many of which are no longer contemporary.

The evidence of the interior photographs:

- The nominator did not understand the importance of the five-year-old interior photographs that were included in the nomination that show dividing masonry walls in the basement of the front block of the building. This is a very unusual configuration for a modern building – and makes it obvious that the walls are remnants of the pre-1929 row buildings that once occupied the site – a fact that could have been confirmed by examining the pre-fire conditions from historic atlases.
- The visual evidence also shows that the basement walls are standard mid-19th century row house construction with walls of rubble stone infilled with clay lime mortar. That mortar fails when exposed to exterior moisture. Topped with brick to carry the steel structure, these walls raise the question of whether this was a quickie building on the cheap in which the site was not fully cleared after the 1929 fire that destroyed the factory; previous elements were simply incorporated into the new building.



Rubble masonry party walls of original rowhouses; rubble masonry foundations of party walls and front wall (yellow arrows) from original rowhouses.

Conclusion:

Inadequate evidence was presented in the nomination to meet either criteria and the nomination should be rejected. The immediate neighborhood no longer presents a cohesive character that the building can be said to represent. Instead, the vast proportion of the neighborhood has recently been demolished and major areas are now being rebuilt with modern townhouses and apartment houses. Second, the building itself is a poor example of the Colonial Revival with most of its features representing various 1920s style, mixed together with no one style predominating.

Other Issues with the nomination:

The nomination is lacking in information, naive in its evaluation of the Colonial Revival, wrong in its understanding of materials, and poorly drafted with its principal purpose to stop development of the site rather than to designate a building of consequence to the education, history, etc. of the city. There is evidence that the Designation Committee and the full Commission criticized the nomination for its sloppiness and the poverty of the examples cited in the nomination.

Examples of errors and inaccuracies:

Designation Committee hearing, p. 26:

“Mr. Cohen pointed out the extensive grammatical, spelling, and formatting errors in the nomination. Mr. Schaaf agreed. Mr. Beisert defended the submitted draft and noted the main reason for these flaws was the speed with which the nomination was written, owing to a demolition threat.”

“Mr. Cohen commented on the representative examples of Colonial Revival style warehouse and factory type buildings included in the nomination. He suggested that some of the examples hurt the argument for significance rather than help it. Mr. Cohen also suggested that these examples should include their construction dates and original uses as part of the captions of their photographs.”

Examples of the errors follow. The photographic captions have not been corrected and the information that should have been included on the various example buildings would have undercut the nomination.

- On p. 3 the nomination refers to features as meeting a “primary tenant of the Colonial Revival Style....” The proper word would have been tenet.
- On p. 3, the semicircular window above the door is described as “elliptical.” It is clearly not that shape.
- The door opening is framed by radially laid bricks – not a soldier course.
- The masonry units described as “key blocks” are in fact imposts.
- The stone band above the door is described as “A decorative belt courses...” By shape it is actually an entablature – that sits uneasily on the keystone of the doorway. The juxtaposition of keystone and entablature suggests a lack of literacy about either the Colonial Revival or the classical revival styles by the original designer and again calls into question the actual style
- The material of the cornice described as “... a lightly-colored, smooth-faced stone or concrete” is copper sheet metal.
- The reference to the second story windows “... appears to be metal, multi-light industrial sash windows” makes one wonder if the nominator ever visited the site.

Finally, the bibliography is inadequate both for its brevity and for the lack of literature on the development of the Spring Garden neighborhood and the lack of adequate discussion of the proposed Colonial Revival style in the context of the architectural literature of the day.

On the grounds of physical condition and lack of fitness for designation, divergence from the chosen style, and the transformed environment that the building no longer exemplifies, the commission should reject this nomination.