

COMMENT ON NATIONAL REGISTER NOMINATION

ADDRESS: 5115-39 BELFIELD AVE, Bellevue Worsted Mills

OVERVIEW: The Pennsylvania Historical & Museum Commission (PHMC) has requested comments from the Philadelphia Historical Commission on the National Register nomination of 5115-39 Belfield Avenue, which is located in the Germantown neighborhood of Northwest Philadelphia and was historically known as the Bellevue Worsted Mills. PHMC is charged with implementing federal historic preservation regulations in the Commonwealth of Pennsylvania, including overseeing the National Register of Historic Places in the state. PHMC reviews all such nominations before forwarding them to the National Park Service for action. As part of the process, PHMC must solicit comments on every National Register nomination from the appropriate local government. The Philadelphia Historical Commission speaks on behalf of the City of Philadelphia in historic preservation matters including the review of National Register nominations. Under federal regulation, the local government not only must provide comments, but must also provide a forum for public comment on nominations. Such a forum is provided during the Philadelphia Historical Commission's meetings.

According to the nomination, the Bellevue Worsted Mills is significant under Criterion A in the Area of Industry, as a prominent manufacturer of worsted dress goods, and exemplified the major role that worsted yarn played in the industrial history of Germantown during the late nineteenth and early twentieth centuries. The company was founded in 1889 by manufacturer Benjamin W. Greer and the mill became well known for their men's shirts, suits, and overcoats. The mill's goods were marketed across the country and the success allowed Greer to expand the mill complex several times. The period of significance begins in 1889 when the mill began operations and ends in 1918 when the company moved its operations to a new facility at N. 16th and Hunting Park Avenue.



United States Department of the Interior
National Park Service**National Register of Historic Places Registration Form**

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of PropertyHistoric name: Bellevue Worsted MillsOther names/site number: NAName of related multiple property listing: NA**2. Location**Street & number: 5115-5139 Belfield AvenueCity or town: Philadelphia State: PA County: PhiladelphiaNot for Publication: NA Vicinity: NA**3. State/Federal Agency Certification**

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this X nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

___national ___statewide ___local Applicable National Register Criteria: A B C D

Signature of certifying official/Title:_____
DatePennsylvania Historical & Museum Commission

State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of commenting official/Title:_____
Date_____
State or Federal agency/bureau or Tribal Government**4. National Park Service Certification**

I hereby certify that this property is:

___ entered in the National Register

___ determined eligible for the National Register

___ determined not eligible for the National Register

___ removed from the National Register

___ other (explain:) _____

Signature of the Keeper_____
Date of Action

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5. Classification

Ownership of Property

Private:

☒

Public – Local

☐

Public – State

☐

Public – Federal

☐

Category of Property

Building(s)

☒

District

☐

Site

☐

Structure

☐

Object

☐

Number of Resources within Property

Contributing

2

0

0

0

2

Noncontributing

0

0

0

0

0

buildings

sites

structures

objects

Total

Number of contributing resources previously listed in the National Register: 0

6. Function or Use

Historic Functions

INDUSTRY/PROCESSING/EXTRACTION – Manufacturing facility

Current Functions

VACANT/NOT IN USE (The prior use as a garage and storage facility has ceased, and the buildings are in the process of being emptied of equipment and materials.)

7. Description

Architectural Classification: Other (Industrial vernacular)

Principal exterior materials of the property: Schist, stucco

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Narrative Description

Summary Paragraph

The Bellevue Worsted Mills complex is located on the north side of Belfield Avenue in the East Germantown neighborhood of Northwest Philadelphia. The trapezoidal-shaped property, which contains two nineteenth-century stone mills – Mill #1 and Mill #2 – is bounded by Belfield Avenue to the south, Armstrong Street to the west and north, and Wister Street to the east (see **Figures A and B**). The site slopes down toward the center on the west, north and east sides, creating a shallow bowl-like topography. On the south side, an approximately 15'-high concrete retaining wall, which was built in 1912-1913 when Belfield Avenue was constructed, separates the property from the street. The retaining wall is not part of the property, but imposes physically and visually upon the property. Situated high above the site, Belfield Avenue is more or less level with the second floor of each mill (a metal pedestrian bridge, added sometime after 1924, connects the second floor of Mill #1 to the sidewalk along Belfield Avenue). The two mill buildings, which have load-bearing schist walls (although Mill #1 is covered in stucco), are diagonally situated on the site, almost parallel to the western boundary (Armstrong Street). Much of the site to the west, north and east of the mill buildings is densely covered by trees and other thick vegetation while the areas to the south of and between the mills are paved in asphalt (there is also an asphalt area directly adjacent to the east elevation of Mill #1, between the building and the nearby trees). Except on the south side, a chain-link metal fence surrounds most of the property (as seen in early insurance surveys, fences did exist in some locations on the property historically, although not in the location of the present perimeter fence). Through the 1950s, the mills were used by various textile manufacturing firms. Between the 1960s and early 1980s, the complex was owned and operated by a surgical equipment manufacturer. In 1984, La Salle University, which is located adjacent to the property, acquired the property and later converted Mill #1 into its facilities and maintenance department, a function which it served until very recently.



Figure A: Current Aerial View, looking north (Pictometry). In this view, Belfield Avenue is at the bottom, and Wister Street is at far right.

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Figure B: Current Aerial View, looking south (Pictometry). In this view, Belfield Avenue is at the top, and Wister Street is at far left

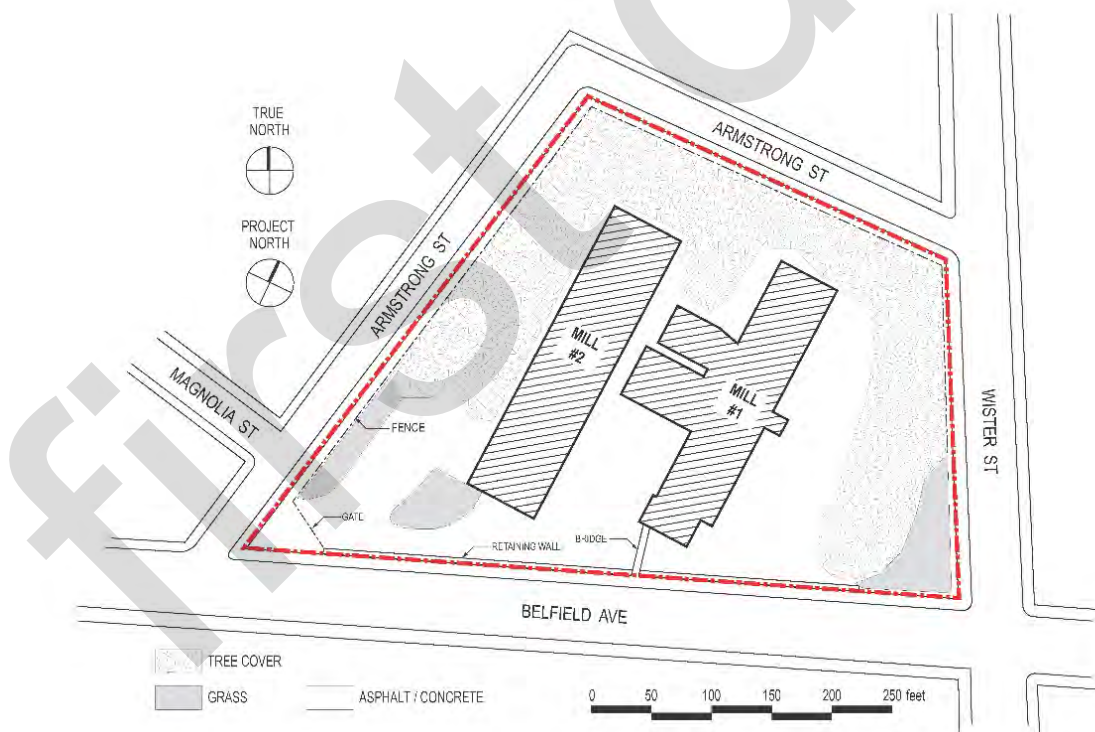


Figure C: Site Plan with National Register Boundary. The boundary matches the post-1912 parcel and includes all remaining resources associated with the Bellevue Worsted Mills. The parcel originally extended slightly farther to the south, but in 1912 the City took this part of the property through eminent domain in order to build Belfield Avenue over what was Wingohocking Creek.

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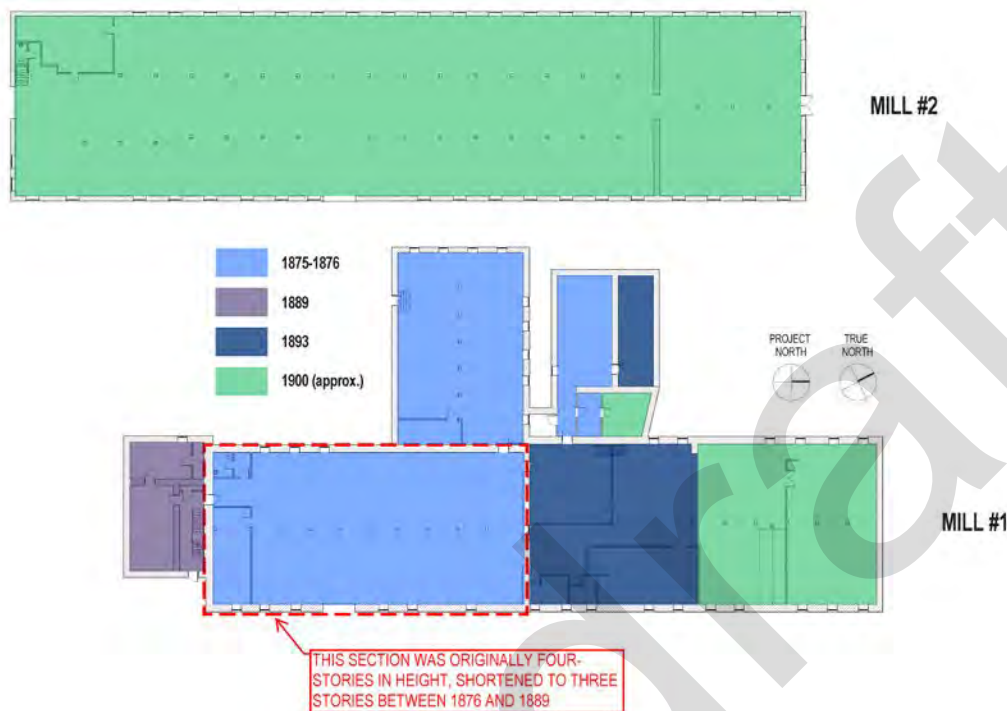


Figure D: Building Chronology Plan. The areas shaded in blue (built 1875-1876) comprise the original four-story mill as illustrated in the 1876 fire insurance survey (**Figure 2**) except that a portion of the fourth floor (circled in red in this image) was removed before 1889 as it does not appear in the insurance survey done that year (**Figure 4**).

Mill #1 – 1875-1876, 1889, 1893, 1900 (Contributing)

Mill #1 consists of the original L-shaped, three- and four-story mill building that was built in 1875 as well as a three-story addition built on the south elevation in 1889 and larger three-story additions that extended the building to the north in 1893 and 1900 (see **Figure C: Building Chronology Plan**). The long, three-story section (including all later additions) measures approximately 55' by 240' in plan, while the four-story section, which is perpendicular to the three-story section, measures approximately 45' by 60'



Photo 1: East elevation of Mill #1, looking northwest from Belfield Avenue. The rooftop monitor on the southern half of Mill #1 is visible in this view. The square tower on the east elevation contains an elevator shaft.

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Photo 2: East elevation of Mill #1 (south end), looking west. The retaining wall seen at far left was built in 1912-1913 when Belfield Avenue was extended through the property.

Both sections have stucco-clad schist walls and low-pitched gabled roofs. It is unclear when the stucco finish was installed, however in some locations it appears that the current, slightly textured stucco was applied over an earlier, much thicker and smoother stucco that likely dates to the early twentieth century (an aerial photo from 1929 shows the building clad in stucco). On all elevations, many of the original window openings are blocked in and covered with stucco, alterations that were completed by a later tenant in 1969-1970. The windows that do remain are one-over-one, double-hung aluminum units that appear to have been installed sometime in the last 10 years, replacing earlier replacement windows that were installed in 1969-1970. These windows sit within the original openings.



Figure D: Aerial view by Dallin Aerial Survey, 1929, looking west toward the east elevation of Mill #1. This image shows Mill #1 with a stucco exterior, but prior to the infill of some of the window openings in 1969-1970.

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Photo 3 (left): North elevation of Mill #1 (three-story section), looking southwest.

Photo 4 (right): North elevation of Mill #1 (four-story section), looking south.

On the east elevation, there is a three-story square tower that projects out from the main volume (**Photo 1**). This tower, which contains an elevator shaft, was built with the northernmost addition in 1900. Other notable features include a narrow rooftop monitor located on the ridge of the original three-story section from 1875 (**Photo 1**). On the north elevation, the center opening on the third floor contains original paneled wood loft door (**Photo 3**). Adjacent to the north elevation of the four-story section is a one-story boiler house that was built in 1875-76 and expanded in 1893 and 1900 (the boiler house, which is connected to the first floor of Mill #1, was not accessible at the time of survey due to locked doors). As it was built with and is internally connected to Mill #1, the boiler house is not counted as a separate resource. At the northwest corner of the four-story section, there is square chimney with a cylindrical top (**Photo 4**). The chimney is a part of the original 1875 construction however the cylindrical section appears to have been reduced in height compared to the version that exists in several nineteenth-century fire insurance surveys.



Photo 5: South and west elevations of Mill #1, looking northeast. At far left, an elevated, horizontal steel framing member between the four-story section of Mill #1 and Mill #2 is likely a remnant of a covered passage that is indicated on a 1924 Sanborn map (**Figure 10**).

On the south elevation of the four-story section, a metal fire escape, which was installed around 1900, spans the three easternmost bays on the second through fourth floors (**Photo 5**). On the south elevation of

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the three-story section, a metal bridge connects a door opening in the westernmost bay on the second floor to the sidewalk along Belfield Avenue (**Photo 5**). The precise date of the bridge is not known. The bridge does not appear on a 1924 Sanborn map, therefore it postdates the period of significance (**Figure 10**).

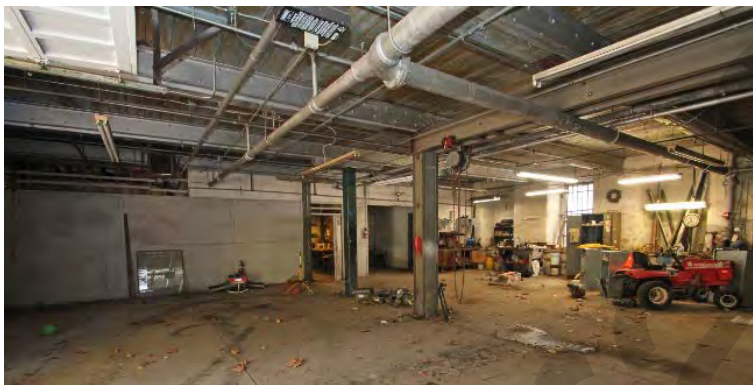


Photo 6: First floor of Mill #1 (three-story section), looking southwest.



Photo 7 (left): First floor of Mill #1 (three-story section), looking south.



Photo 8 (right): First floor of Mill #1 (three-story section), looking northwest.

The interior of Mill #1 retains nearly all original nineteenth-century finishes and structural features. Most of the historic interior volumes and spatial arrangements also remain intact. Except as explained below, the interior has changed little over the last 121 to 146 years.



Photo 9 (left): Second floor of Mill #1 (three-story section), looking south.



Photo 10 (right): Second floor of Mill #1 (four-story section), looking southwest.

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While many of the window openings have been infilled and are not visible on the exterior side, all of the openings remain visible on the interior side, allowing the historic fenestration pattern to be more easily understood. The first floor of Mill #1 contains a number of workspace storage areas that have been created by La Salle University over the past 35 years (**Photos 6-8**). The finishes in these areas consist of concrete floors, parged perimeter walls, and heavy timber columns and beams that have been reinforced with steel I-beams in many locations. Partitions between the various spaces consist largely of plywood over two-by-four framing (painted in some cases).



Photo 11 (left): Second floor of Mill #1 (three-story section), looking north.



Photo 12 (right): Second floor of Mill #1 (three-story section), looking north

On the second floor, the north half of the three-story section contains a modern, open office space with carpeted floors, drywall partitions and dropped acoustical tile ceilings (**Photo 9**). The remainder of the second floor contains wood floors (both diagonal and straight, depending on the section), parged perimeter walls, and heavy timber columns and beams at the ceiling (**Photos 10-12**).



Photo 13 (left): Third floor of Mill #1 (three-story section), looking south.



Photo 14 (right): Third floor of Mill #1 (three-story section), looking north.

The third floor of the three-story section (the top floor of that section) consists of a single large space with diagonally laid wood floors, parged perimeter walls, and exposed heavy timber roof trusses, which are painted (**Photos 13, 14**). Within the third floor space, the original rooftop monitor, featuring continuous six-over-six, double-hung wood windows, is visible (**Photo 15**). The third floor of the four-story section contains finishes similar to the three-story section but also contains a small room at the northwest corner with drywall partitions (**Photo 16**).

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Photo 15: Third floor of Mill #1 (three-story section), rooftop monitor.



Photo 16 (left): Third floor of Mill #1 (four-story section), looking southwest. The partition at the northwest corner of this space (in green) consists of 2x4 framing with drywall, therefore it almost certainly did not exist during the tenure of Benjamin W. Greer.

Photo 17 (right): Fourth floor of Mill #1 (four-story section), looking northwest.

One straight-run, utilitarian wood stair is located near the south end of the building, providing access between the first and third floors. A similar stair exists in the four-story section, providing access only between the third and fourth floors. A freight elevator shaft is located roughly at the midpoint of the east elevation, containing sliding metal doors on each floor.

The fourth floor of the four-story section has wood floors, parged perimeter walls, and exposed heavy timber roof trusses, which are painted (**Photo 17**).

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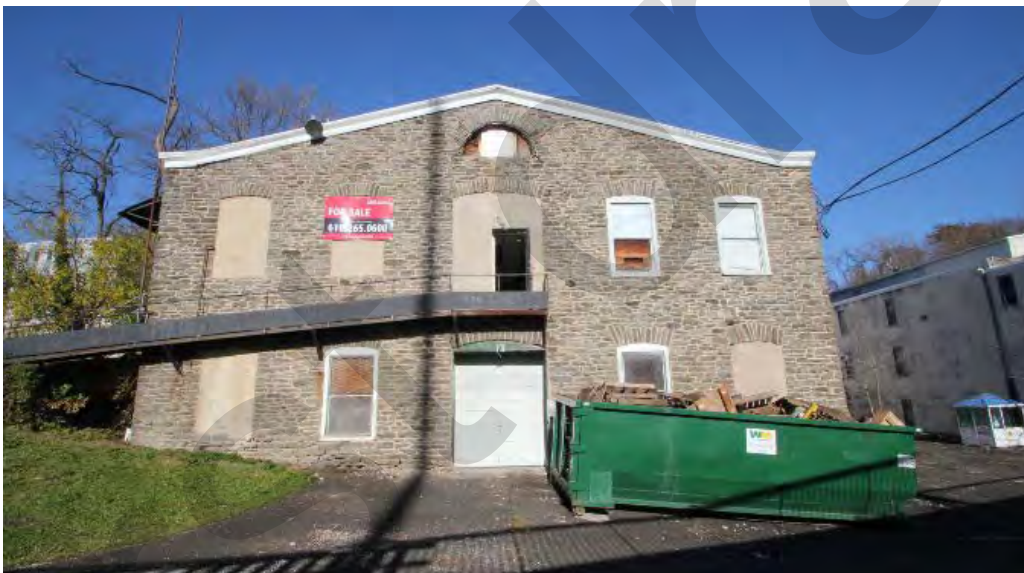


Photo 18 (top): South and east elevations of Mill #2, looking northwest.

Photo 19 (bottom): South elevation of Mill #2, looking north. The wider center openings on the first and second floors are original, but now contain later replacement doors and infill.

Mill #2 – 1900 (Contributing)

Mill #2 is a two-story, approximately 60' by 250' rectangular mill building with schist exterior walls that was built in 1900, replacing an earlier building in the same general location. The north end of the building, a section that measures approximately 45' long, is one-story tall. Both the one- and two-story sections have low pitched gabled roofs like Mill #1 and contain painted metal cornices. Although some of the original window openings have been infilled with stucco on each of the four elevations, the openings, including their segmental arched heads, are still apparent (**Photo 18**). The windows that do remain are one-over-one, double-hung aluminum replacement units that were installed sometime in the last 30-40 years. On the south elevation, there are larger, garage-sized openings in the center bays, which retain their original size, but with later door replacements and/or infill: the opening on the first floor contains a modern, roll-down metal door and the opening on the second floor contains largely stucco infill with a

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single, hollow-metal swinging door (**Photo 19**). Above the center opening on the second floor, there is a half-circle window opening that currently contains an aluminum louver with plywood panels on the sides.



Photo 20 (left): West elevation of Mill #2 (south end), looking east.



Photo 21 (right): West elevation of Mill #2, looking northeast from the loading dock seen in Photo 20.

A metal ramp parallel to the south elevation slopes down from the entrance in the center bay on the second floor to the parking area west of the building. On the west elevation, the first and third bays from the south contain roll-down metal garage doors (**Photo 20**). These loading bays are accessed by short concrete ramps. The first bay contains a partial corrugated metal awning. Most of the remainder of the west elevation, as well as the north elevation, is largely obscured by trees and overgrown bushes (**Photo 21**).



Photo 22: First floor of Mill #2, looking north.

Like Mill #1, the interior of Mill #2 retains nearly all of its original nineteenth-century finishes and structural features. Most of the historic interior volumes and spatial arrangements also remain intact.

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Except as explained below, the interior has changed little over the last 121. The first floor is largely open in plan, containing concrete floors, parged perimeter walls, as well as two rows of heavy timber columns supporting the heavy timber floor joists at the ceiling (**Photo 22**). On the second floor, there are a few small offices at the southeast corner that occupy less than 10% of the total floor area. These spaces contain carpeted floors, partitions with drywall or painted wood panels, dropped acoustical tile ceilings and appear to date to the 1960s or later (**Photos 23-24**). The remainder of the second floor contains diagonally laid wood floors, parged perimeter walls, and exposed heavy timber roof trusses, which are painted (**Photos 25-26**).



Photo 23 (left): Second floor of Mill #2, looking south.



Photo 24 (right): Second floor of Mill #2, looking north.



Photo 25 (left): Second floor of Mill #2, looking south.



Photo 26 (right): Second floor of Mill #2, looking north.

Integrity

The Bellevue Worsted Mills retains integrity. In particular, the design of the complex and the materials the mills are built of remain largely intact and are expressed in a consistent vernacular industrial style. In particular, the overall form and the defining industrial characteristics of the mill buildings remain intact, including the massing of and relationship between the two mills, the exterior stucco walls of Mill #1, the exterior schist walls and regular window openings of Mill #2 as well as the concrete and wood floors and characteristic heavy timber columns and beams in both mills. While some partitions have been built to create small offices, workspaces and storage rooms in various parts of both mills, the overall spatial arrangements and volumes remain intact. The original manufacturing function of the complex is easily conveyed.

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While the original windows in Mill #2 were replaced during the 1980s, very few of the window openings were altered, therefore the historic fenestration pattern remains intact. In Mill #1, although many of the original window openings are not currently visible – they were infilled with stucco coated concrete block in 1969 – all of the original openings are apparent on the interior. Due to the thickness of the exterior walls of Mill #1, the concrete block infill has not completely infilled the openings. Apart from the infill of many of the window openings in Mill #1, the exterior massing remains virtually intact, and it is easy to understand the mill as a nineteenth-century industrial building.

The location and setting of the Bellevue Worsted Mills also remain largely intact. The mills have remained in the same location since they were built between 1875 and about 1900 and the surrounding property has changed little since their construction. While dense tree cover and other thick vegetation today covers much of the site to the west, north and east of the mill buildings, the property otherwise retains the openness that it has always had. The most significant change to the landscape occurred in 1912-1913 (within the period of significance) when Wingohocking Creek was covered by Belfield Avenue.¹ Historically, the ground south of the mills was more or less flat, sloping gently down to the creek. However, due to the property's topography – it was and remains a low-lying site between more elevated ground on either side – Belfield Avenue was effectively built as a bridge, requiring the construction of the retaining wall that exists today.

The immediate surrounding area, which historically consisted largely of other industrial properties (including several textile mills) interspersed with workers' rowhouses, particularly west of Armstrong Street, has not changed significantly in the last century. Some recent development, including a three-story addition atop a one-story, early twentieth century commercial building on the west side of Armstrong Street, has occurred but has not significantly changed the character of the area. Several former nineteenth century mills, in particular along Belfield Avenue between Wister Street to the east and Penn Street to the west, remain intact. To the east across Wister Street, the Belfield estate, which was the home of artist Charles Willson Peale between 1810 and 1826 and is a designated National Historic Landmark, has changed little since the early nineteenth century. Although a sliver of the subject property was taken by the City of Philadelphia through eminent domain to build Belfield Avenue in 1912, the property itself has not changed significantly since it was acquired by John Bromley in 1875.

¹ "Belfield Avenue Measure Opposed," *The Philadelphia Inquirer*, November 4, 1912; "Street Damages Assessed," *The Philadelphia Inquirer*, July 15, 1913. Both the Bromley family, the owners of the Bellevue Mills property, and the mills' proprietor, Benjamin W. Greer, were compensated by the City for the partial loss of property caused by the construction of Belfield Avenue over the southernmost sliver of the original parcel.

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8. Statement of Significance

Applicable National Register Criteria

- ☒ A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- ☐ B. Property is associated with the lives of persons significant in our past.
- ☐ C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- ☐ D. Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations

- ☐ A. Owned by a religious institution or used for religious purposes
- ☐ B. Removed from its original location
- ☐ C. A birthplace or grave
- ☐ D. A cemetery
- ☐ E. A reconstructed building, object, or structure
- ☐ F. A commemorative property
- ☐ G. Less than 50 years old or achieving significance within the past 50 years

Areas of Significance: Industry

Period of Significance: 1889-1918

Significant Dates: N/A

Significant Person: N/A

Cultural Affiliation: N/A

Architect/Builder: Unknown

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Statement of Significance Summary Paragraph

The Bellevue Worsted Mills property is significant under Criterion A in the area of Industry as a prominent manufacturer of worsted dress goods in the Germantown section of Northwest Philadelphia, exemplifying the major role that worsted yarn played in the industrial history of that section of the city during the late-nineteenth and early-twentieth centuries. Founded in 1889 by manufacturer Benjamin W. Greer, the mill became well known for their men's shirts, suits, and overcoats. Bellevue's New York City selling agents marketed the mill's goods across the country, leading to a long run of success that allowed Greer to expand the mill complex several times. The period of significance begins in 1889, when the mill began operations, and ends in 1918, when the company built a new mill at North 16th Street and Hunting Park Avenue.

Narrative Statement of Significance

History of the Bellevue Worsted Mills

In 1875, John Bromley, one of Philadelphia's foremost carpet manufacturers, acquired the property that would later be occupied by the Bellevue Worsted Mills from landowner John Armstrong. Bromley quickly began construction on a small mill complex, which was completed in 1876 and became known as the Glencairn Woolen Mills. The mill replaced the earlier Glen Bank Mill, which was presumably built by Armstrong and is marked as "burned" on an 1871 map (**Figure 1**).



Figure 1: Map showing the Old Glen Bank Mill. From the *Atlas of the Late Borough of Germantown*, G.M. Hopkins, 1871 (from the collection of the Athenaeum of Philadelphia). The mill was located in the same general location as the present buildings. Stenton Avenue is now Wister Street (along the east side of the property). Belfield Avenue was built over Wingohocking Creek in 1912.

The origins and history of the Glen Bank Mill are largely unknown, as no reference to the mill has been found anywhere except the 1871 map and a later atlas dating to 1875. Bromley's motivation for opening a new mill in Germantown is also unknown, for his home and his enormous carpet mill were located several miles to the southeast, in the Kensington section of the city. Bromley's desire to locate in Germantown may have been due to the fact that some of the most skilled woolen yarn spinners were located in that part of the city, or perhaps because he wished to produce varieties of yarns not then offered by his usual suppliers (following the Philadelphia aspect of specialization in the textile industry,

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Bromley's carpet mill focused specifically on the weaving of carpets, relying on independent wool spinners and dyers to process the raw material prior to it arriving at the Bromley mill).

The opening of the Glencairn Mill followed a long history of textile production in Germantown dating back nearly two centuries. The earliest settlers in the area, German Mennonites and Quakers, began to produce linen soon after they arrived in 1683. During the eighteenth century, the area became well-known for its stockings, and later, during the mid-nineteenth century, for its hosiery, which was produced by predominantly English immigrants. The Wissahickon and Wingohocking creeks provided water power to many of the early mills before steam power became commonplace. Although textiles would remain a cottage industry until the Civil War, Germantown became well-known for high quality products, especially the worsted yarns that dominated production in the area beginning in the 1860s. Although Kensington would surpass Germantown as the city's center of textile production after the Civil War, Germantown maintained a prominent position in this industry, particularly as its worsted yarns earned a national reputation.²

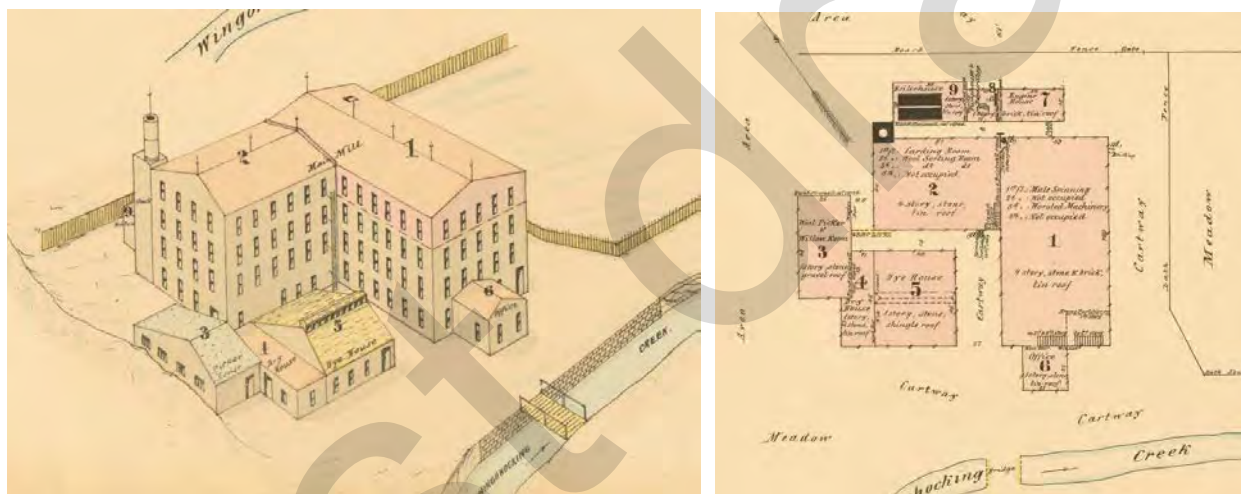


Figure 2 (left): Hexamer General Survey #1029, surveyed 1876. 3D view. It is likely that the bridge across Wingohocking Creek was built by the property owner (Bromley) or mill proprietor (Greer) to allow employee access to the mill.

Figure 3 (right): Hexamer General Survey #1029, surveyed 1876. Plan view.

As illustrated in a fire insurance survey prepared in 1876, the Glencairn Mill consisted of a four-story, L-shaped building which largely survives today as the southern half of Mill #1 (**Figures 2 and 3**). Part of the fourth floor (shaded in red in **Figure 2**) was later removed. There was also a connected group of one-story buildings, including a dye house, dry house, and picker house (Buildings 3, 4 and 5 as labeled on the survey). According to the survey, Bromley's operation occupied the first floor and part of the second floor with a tenant, Foster & Isles Worsted Yarn Manufacturers, occupying the third floor. The remainder of the second floor and the fourth floor were not yet occupied and "will be rented to other manufacturing parties." By 1884, both occupants had been replaced by other textile manufacturing firms, including Henry F. Scatchard and Stead & Johnsen, both of whom were woolen yarn manufacturers (John Bromley's death in 1883 may have precipitated the shutdown of the Bromley yarn spinning operation at

² Martha C. Halpern, "Germantown Goods: A Survey of the Textile Industry in Germantown," *Germantown Crier*, v.43, no.1 (Winter 1990).

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the Glencairn mill). Both were also present during a June 1884 fire that seriously damaged the building and destroyed much of the equipment and machinery inside.³

In 1889, textile manufacturer Benjamin W. Greer replaced the earlier tenants of the Glencairn Mill, making his Bellevue Worsted Mills the sole occupant. The estate of John Bromley – Bromley himself died in 1883 – continued to own the property throughout Greer's tenancy. Greer was born in Pennsylvania in 1854 to Irish immigrant parents.⁴ It is unclear how Greer came to be involved in the textile industry, although by 1879 he had formed a partnership with George C. Hetzel, known as Greer & Hetzel, which operated a mill producing shirt fabrics at 16th and Reed Streets in the Point Breeze section of South Philadelphia. The mill moved to 18th and Washington Streets, just a couple of blocks away, in 1881, and again to 13th and Carpenter Streets in 1883. It was after the last move that the company, which had specialized in cotton fabrics, gradually transitioned to producing worsted and woolen fabrics for menswear. In 1888, Greer left the business, having been bought out by Hetzel. It is likely that Greer's motivation was his desire to form his own company, which he founded in 1889.⁵ Greer's two brothers, Joseph and David, were also involved in the manufacture of worsted goods, each with his own mill in Kensington.

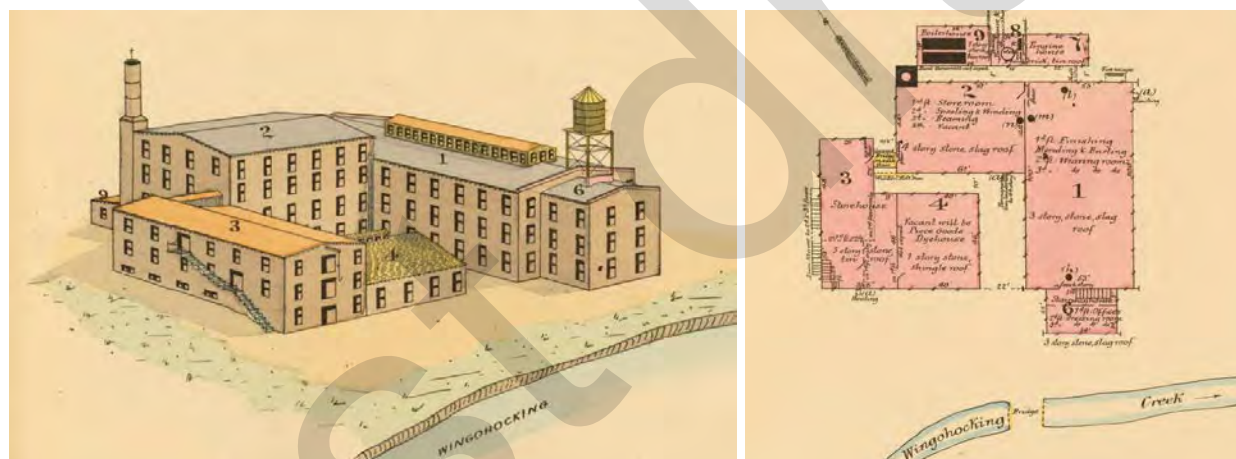


Figure 4 (left): Hexamer General Survey #2278, surveyed 1889. 3D view.

Figure 5 (right): Hexamer General Survey #2278, surveyed 1889. Plan view. It is likely that the bridge across Wingohocking Creek was built by the property owner (Bromley) or mill proprietor (Greer) to allow employee access to the mill.

Greer made significant changes to the property shortly before he opened the Bellevue Worsted Mills in 1889. As shown in a Hexamer fire insurance survey published that year (**Figures 4 and 5**), the fourth floor of Mill #1 (Building 1 as labeled on the survey) had been removed, possibly due to the earlier fire, and a rooftop monitor, which survives today, was installed along the center ridge of the new roof. Additionally, Greer built a three-story addition (Building 6 as labeled on the survey) to house offices on the south side of Mill #1. Lastly, Greer replaced the former one-story picker house on the west side of the dye house with a three-story mill (Building 3 as labeled on the survey).

³ "Factory on Fire," *The Philadelphia Inquirer*, June 26, 1884.

⁴ United States Census, 1880 and 1910; United States Passport Application, 1906.

⁵ Samuel T. Wiley, *Biographical and Historical Cyclopedia of Delaware County, Pennsylvania* (New York: Gresham Publishing Company, 1894), 374.

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According to *Historical and Commercial Philadelphia*, published in 1892, “a decided success has been achieved by Mr. Benjamin W. Greer” since he began his business three years prior, having since then “built up a splendid trade throughout the United States and won a reputation for his goods of a high character that any manufacturer might take pride in.” The publication goes on to describe the Bellevue Worsted Mills complex, comprised of a four-story building and fitted with 180 looms, a 150-horse power engine and “all required machinery and appliances.” The mill, which produced worsted cloth for the clothing trade, provided employment to 200 “experienced operatives” and its operations were personally directed by the proprietor. The market for Bellevue fabrics, “unexcelled for finish, quality, and uniform excellence,” extended to all parts of the country.⁶

The Bellevue Worsted Mills is a prominent example of the numerous woolen mills that opened or expanded in Germantown in the decades following the Civil War. Like Philadelphia as a whole, the area’s textile industry had long centered on cotton, with the raw material being imported primarily from southern states. But the supply of cotton was interrupted during the war, forcing many manufacturers to retool their operations to manufacture uniforms, blankets and other goods for Union soldiers in more readily available wool.⁷ After the war, many of these firms transitioned back to consumer goods, and while cotton returned to Philadelphia mills, woolen goods continued to grow in popularity. Soon, the woolen goods sector of the Philadelphia textile industry began to overtake cotton. By 1910, the city’s woolen goods output of \$26.9 million was over 50% larger than its cotton output, which came in at \$17.4 million, with neither figure including carpets.⁸

Whereas Philadelphia’s Kensington district was known for the virtually limitless diversity of its textile output, producing yarns and finished goods of nearly every variety, Germantown developed a reputation for its woolen, and particularly worsted, yarns and goods (although some diversity in textile manufacturing existed in Germantown, too). Worsted is a type of hard, tight spun wool made through a process whereby wool fibers are combed so that they lie parallel and end to end, eliminating the fluffiness and nap that characterizes other types of woolen goods. Worsted yarns are woven into fine, tight fabrics that are typically used in men’s and women’s suits, outerwear, and other apparel goods. Knowledge of worsted spinning was brought to Philadelphia, and particularly to Germantown, by English immigrants who had gained experience in this area in Great Britain, especially in and around the city of Bradford. Following the Civil War, the “rapid rise” of independent worsted spinners constituted one of the “most important” industrial developments in Germantown in the late-nineteenth century.⁹ By the early 1880s, there were 18 worsted yarn spinners in Philadelphia’s 22nd ward, which largely consisted of Germantown.¹⁰

With the Germantown worsted spinning industry thriving, specialized knitting mills arose to take advantage of the abundant supply of high-quality woolen yarns, which became nationally known as Germantown yarn. Although the mills had expanded beyond their cottage-industry beginnings, with some erecting large, purpose built stone and brick mill buildings, many remained relatively small with fewer than 100 employees. According to the authoritative *Census of Manufactures of Philadelphia*, published in

⁶ *Historical and Commercial Philadelphia* (New York: A.F. Parsons Publishing Company, 1892), 80.

⁷ Richard A. Sauer, “Philadelphia: Economy of War.” Originally appeared in *Civil War Times* (September 2006). Accessed at <https://www.historynet.com/philadelphia-economy-of-war.htm> on March 18, 2021.

⁸ Philadelphia Commercial Museum, “Textile Industries of Philadelphia, with a Directory of the Textile and Yarn Manufacturers Located in Philadelphia” (Philadelphia, 1910), 7, 12.

⁹ Halpern, 11.

¹⁰ Lorin Blodgett, *Census of Manufactures of Philadelphia* (Philadelphia: Dickson & Gilling, 1883), 87-88

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1883 by Lorin Blodgett, only a handful of woolen knitting and weaving mills employed more than 100 persons. These included manufacturers of knit and woven goods such as Conyers Button & Co.'s Germantown Hosiery Mills, with 400 employees; George Peberdy's Winhohocking Hosiery Mills, with 320 employees; J&B Allen's Germantown Knitting Mill, with 300 employees; T.B. Cope & Brother's Osceola Knitting Mill, with 215 employees; and Aaron Jones' Sons' Hinckley Knitting Mills, with 200 employees. With 200 employees in 1892, the Bellevue Worsted Mills counted itself among the largest mills in Germantown.¹¹

Although the Kensington textile district was larger in terms of the number of establishments, on average the physical size of its mills was not significantly greater than those in Germantown. As illustrated in a series of Hexamer fire insurance surveys from the 1870s through the 1890s, the Germantown mills listed above typically consisted of one or two three- or four-story brick or stone mills measuring roughly 40 to 60 feet in width and from 150 feet to 300 feet in length.¹² Except for the use of stone in the construction of exterior walls – schist was far more common in Germantown due to the proximity of quarries – these characteristics could easily describe most late-nineteenth century textile mills in Kensington. A relatively small number of the Germantown mills remain standing, of which the Bellevue Worsted Mills and Joseph Scatchard's Sons yarn spinning mill, located a little over a half mile to the west at the corner of Cheltenham Avenue and Magnolia Street, are among the best examples. Built of brick, the four-story Scatchard mill remains at least partially in use as offices.

Following the Philadelphia system of textile production, which was characterized by specialization, the Bellevue Worsted Mills only produced finished fabrics to be used in the manufacture of apparel. The mill did not process raw wool or spin it into yarn, relying on other nearby mills to do this work. Although it is now demolished, the Joseph Fling Woolen Mill, later the Wister Spinning Company, was located just across Belfield Avenue and may have been one of Bellevue's suppliers. Specialization was the key characteristic that distinguished Philadelphia's textile mills from those found in other regions of the country, such as New England. Whereas New England's mills were typically massive, integrated plants that housed all aspects of production, Philadelphia's textile mills typically focused on the mastery of specific components in the overall production process.¹³ For example, in Philadelphia, a spinning mill might send out its yarn to a small dye shop for coloring before it was forwarded to a larger weaving or knitting mill to be made into carpeting or hosiery.¹⁴ Although some fully integrated mills operated in the city, most firms performed one highly specialized function in the overall process of manufacturing a particular textile product. The advantage of the Philadelphia system was that shops were established with minimal capital investment, and equipment was gradually acquired, factors conducive to ownership by immigrants or others with limited capital.¹⁵

¹¹ Blodgett, 87-88.

¹² The Hexamer surveys are available online through the Athenaeum of Philadelphia's Greater Philadelphia GeoHistory Network: <https://www.philageohistory.org/rdic-images/HGS/index.cfm>, accessed March 22, 2021.

¹³ Philadelphia's specialized method for textile production is discussed at length in Philip Scranton, *Work Sights: Industrial Philadelphia, 1890-1950* (Philadelphia: Temple University Press, 1986).

¹⁴ Philip Scranton, *Work Sights: Industrial Philadelphia, 1890-1950* (Philadelphia: Temple University Press, 1986): 7.

¹⁵ Philip Scranton, *Proprietary Capitalism: The Textile Manufacture at Philadelphia, 1800-1885* (Cambridge, MA: Cambridge University Press, 1989), 415-17. Scranton's last chapter, "Conclusion: Separate Establishments," contains a detailed discussion of the disparity between the Lowell and Philadelphia systems. Information on the textile industries of the counties surrounding Philadelphia is contained in his book, *Figured Tapestry: Production, Markets, and Power in Philadelphia Textiles, 1885-1941* (Cambridge, MA: Cambridge University Press, 1989).

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By the early 1890s, the dress goods produced at the Bellevue Worsted Goods had earned a reputation sufficient enough for Greer to seek a trademark on the Bellevue name. First filed in February of 1893, the trademark was renewed in 1903 and 1913. It consisted of the name "Bellevue" in decorative script and was topped by a monogram of Greer's initials, BWG (**Figure 6**). Like other mills in Germantown and Kensington, the fabrics and finished products that bore the Bellevue logo were designed in-house by designers such as English immigrant Ephraim Rigg, who worked at the mill during the 1890s and eventually became superintendant, and later, Albert L. Sprague, who filled the same role between about 1906 and 1910.¹⁶ Due to their high level of skill, designers were relatively high-ranking employees within the mill and were often lured from other mills. Sprague, for example, worked at a mill in Massachusetts before moving to Philadelphia to begin work at Bellevue.¹⁷

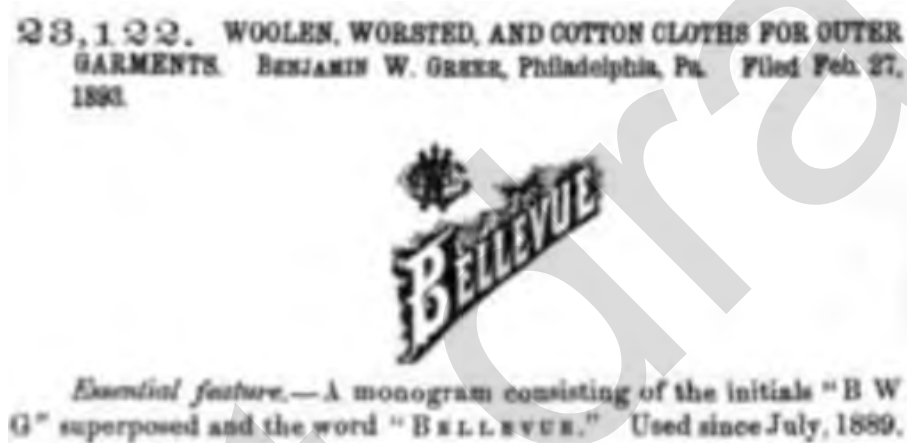


Figure 6: Trademark filed by Benjamin W. Greer in 1893.

One of the likely key factors that led to the prosperity experienced by the Bellevue Worsted Mills in its early years were the protective tariffs introduced as part of the McKinley Tariff Act of 1890. As a means of encouraging the growth of American industry, the U.S. Congress passed Republican Representative William McKinley's legislation to significantly increase tariff rates on a host of imported products. One such product was worsted goods, on which duties as high as 40 percent were instituted. The bill was highly popular among manufacturers. Greer himself went so far as to publicly attack his Democrat party for not supporting the legislation, announcing he would back the reelection of Republican President William Henry Harrison over challenger Grover Cleveland in the 1892 election. Due to Greer's prominence as a manufacturer, the defection made headlines in dozens of newspapers as far west as California, making the man a symbol of the often contentious debates surrounding tariffs during this period. Locally, Greer was criticized, for although the protective tariffs allowed him to pay his workers a relatively high wage—he claimed he paid wages as high as \$16.65 per week—*The Times* suggested the workers were not receiving the full benefit. In fact, the paper implied that the tariffs, which often led to inflated prices and even monopolies, unduly enriched Greer. Although the tariffs were briefly lowered with the Wilson-Gormley Tariff Act of 1894, they were reinstated with the Dingley Act of 1897 and remained in effect until 1909, to the benefit of the Bellevue Worsted Mills.¹⁸

¹⁶ *The Times* (Philadelphia, PA), May 20, 1896; and "Circular of the School of Industrial Art of the Pennsylvania Museum," 30th, 32nd and 33rd Seasons (1906-07, 1908-09, and 1909-10).

¹⁷ "The Woolen Mill," *Fibre and Fabric* (April 29, 1905), 275.

¹⁸ "He is For Protection," *The Daily New Era*, Lancaster, PA, October 13, 1892; "Mr. Greer Answers and Avoids," *The Times*, Philadelphia, PA, October 16, 1892.

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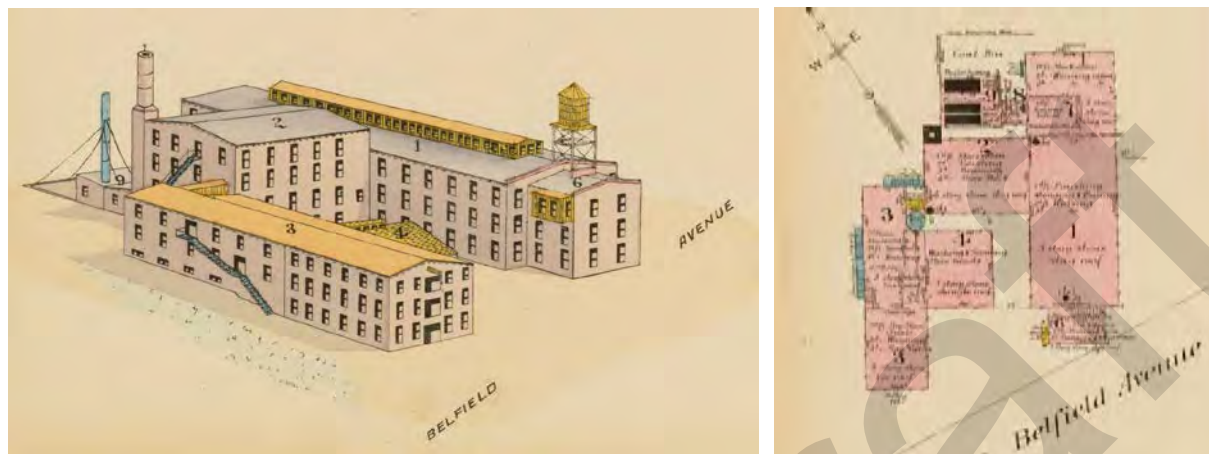


Figure 7 (left): Hexamer General Survey #2718, surveyed 1893. 3D view.
Figure 8 (right): Hexamer General Survey #2718, surveyed 1893. Plan view.

The health of the Bellevue Worsted Mills during the 1890s can be easily understood through the mill's physical expansion and employment statistics. As shown in a Hexamer fire insurance survey published in 1893 (**Figures 7 and 8**), a three-story addition was added to the north side of Mill #1 and what was labeled as Building 3 in the 1889 Hexamer survey (**Figures 4 and 5**) was also expanded to the south. The mill complex as it existed after the 1892 additions is illustrated in an advertisement dating to 1899 (**Figure 9**). The additions naturally allowed for both more equipment and more employees. An 1897 directory indicates that the mill had 250 looms in operation, a major increase over the 170 in operation just a few years prior.¹⁹ And in 1898, a state factory inspector report indicated that the mill employed 248 people, including 107 men and boys and 141 women and girls.²⁰

While late-nineteenth century manufacturer's directories are not specific about the type of dress goods produced by the Bellevue Worsted Mills, several later publications indicate that the company was particularly known for finished goods such as "suitings" and "overcoatings" for men, although some directories suggest that the company did produce womenswear as well.²¹ In addition, the company sold worsted fabrics to be made into finished goods. The mill also had at least one contract with the U.S. government during World War I to produce flannel for shirts.²² Although the government's intended use of this material is not specified, the contract nonetheless suggests that this was a type of product in which Greer and his mills already had experience producing or was at least similar enough to other goods they may already have been producing at the time. Bellevue's goods were initially sold directly to customers, who included department stores and specialty apparel shops. Later, after 1902, Greer outsourced the marketing of Bellevue's products to the commission agents Stevens, Sanford, Cushman & Jordan, whose headquarters in New York City and satellite offices in Boston and Chicago would have sold the mill's goods to a national customer base.²³

¹⁹ *Textile World's Directory of the Mill Trade in the United States* (Boston: Guild & Lord, 1897), 189.

²⁰ *Ninth Annual Report of the Factory Inspector of the Commonwealth of Pennsylvania, for the year 1898* (Harrisburg, PA, 1899).

²¹ *American Trade Index* (New York: National Association of Manufacturers, 1906).

²² "List of Purchase Orders and Contracts Placed by the Army Quartermaster's Department," *The Official Bulletin*, Vol. 2, No. 309 (May 14, 1918), 12.

²³ "Mill Notes," *American Wool and Cotton Reporter* (October 30, 1902), 1428.

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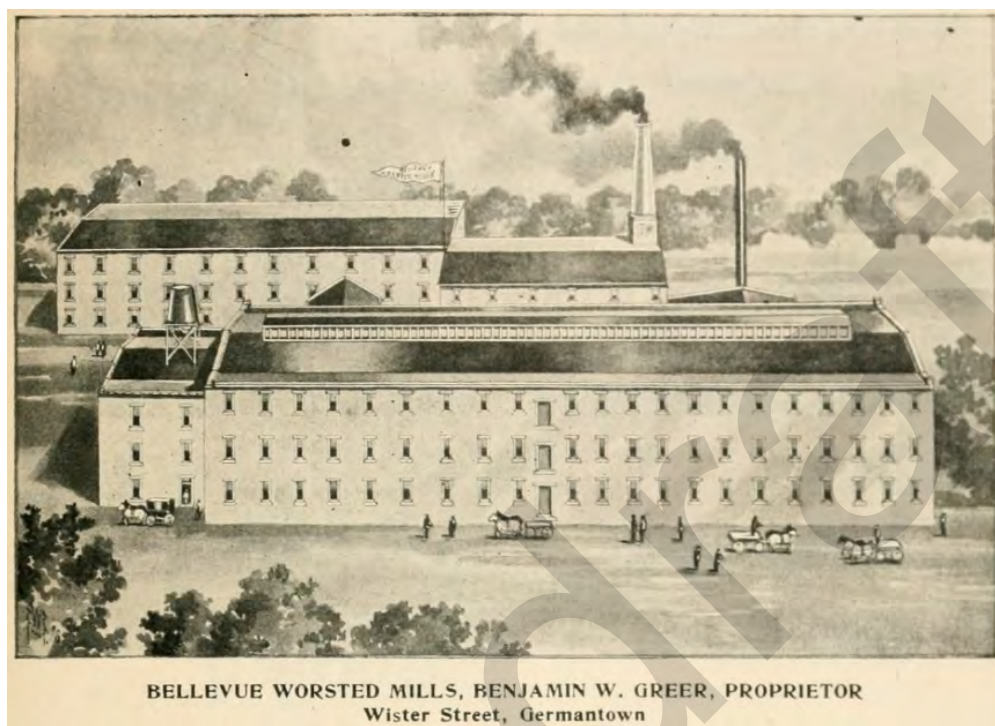


Figure 9: Illustration of the Bellevue Worsted Mills from a period advertisement (1899), looking west toward the east elevation of Mill #1. This illustration was made prior to the final addition to the north end of Mill #1 and the construction of Mill #2 around 1900 (Mill #2 replaced the three-story building seen in the background of this image).

The Bellevue Worsted Mills flourished through the 1890s, with *Fibre and Fabric*, a national trade publication, reporting that the mill was “running steady full time” in July 1898.²⁴ By the end of the decade, business had grown to such an extent that several major new additions were completed. Around 1900 or shortly after, Greer had Building #3 (as labeled on the Hexamer fire insurance surveys, illustrated above) replaced by a larger two-story mill, which is now known as Mill #2. A final three-story addition was also added to the north end of Mill #1, resulting in the complex that remains substantially intact today. In addition to the expansion of the mill buildings, Greer also purchased and installed six new looms in 1906.²⁵

By the mid-1910s, Greer and his two sons, Benjamin W. Greer, Jr., and Francis K. Greer, who had earlier joined their father as partners in the business, contemplated the construction of an entirely new mill. In January 1917, the *Philadelphia Real Estate Record and Builders' Guide* reported that the Greers planned a three-story, 60' by 300' mill at the southwest corner of 16th Street and Hunting Park Avenue, which was about a mile and a half southeast of the present mill.²⁶ Although the floor area of the new mill would be roughly the same as the existing complex, it had the advantage of being contained within a single structure, not split between two mills as was the case on Belfield Avenue. Construction of the new mill was delayed by World War I, which the United States entered in April 1917, however the building

²⁴ “Philadelphia Items,” *Fibre and Fabric*, Vol. XXVII, No. 696 (July 2, 1898), 230.

²⁵ *Fibre and Fabric*, Vol. XLIV, No. 1136 (December 6, 1906), 20.

²⁶ *Philadelphia Real Estate Record and Builders' Guide* (PRERBG), January 31, 1917, p. 79.

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appears to have been operational by mid-1918. While sources do not reveal the precise motivation behind the construction of the new mill, such a significant investment – the building was reported to cost \$200,000 – suggests that the Bellevue Worsted Mills was thriving well into the late 1910s.²⁷

Benjamin W. Greer, Sr., died in October 1920, leaving his two sons in control of the Bellevue Worsted Mills.²⁸ The company lasted less than a decade after moving into the new mill at 16th and Hunting Park. In 1925, the official state industrial directory reported that Bellevue employed only 68 people – down from its peak of 250 during the late 1890s, although it is unclear if a reduction in the workforce was partially due to more efficient, modern equipment – and as early as the following year the company began leasing large spaces within the building to other manufacturing firms.²⁹ The Bellevue Worsted Mills does not appear in the next edition of the official state directory, published in 1927.

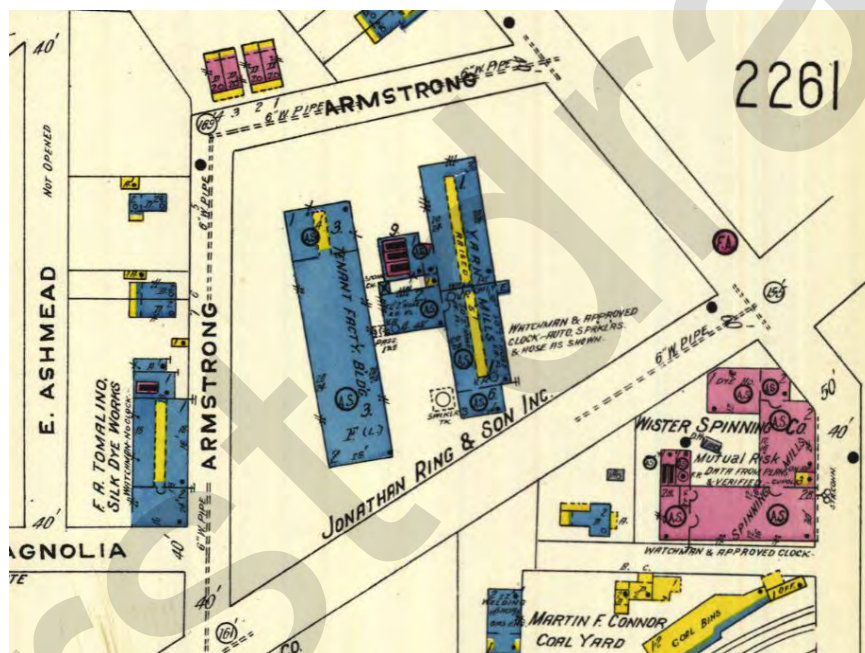


Figure 10: Sanborn fire insurance map, 1924 (Penn State University). As seen in this map, a one-story “passage,” which was likely covered, once connected west side of the four-story section of Mill #1 to the east side of Mill #2. Although largely missing, evidence of the passageway can be seen in Photo 5, which shows an elevated, horizontal steel framing member between the two buildings.

Back on Belfield Avenue, the former Bellevue Worsted Mills was occupied by a succession of textile manufacturing companies after 1918. A Sanborn fire insurance map published in 1924 indicates that Jonathan Ring & Son, Inc., owned the property and operated their yarn spinning business out of Mill #1 (**Figure 10**). The significance of this branch mill of Jonathan Ring & Son cannot be established. While the company was a prominent one – the main Ring mill was located at Hancock and Montgomery Streets in the Kensington section of the city (this mill was demolished during the 1980s) – the Belfield Avenue

²⁷ *PRERBG*, November 14, 1917, p. 749.

²⁸ “Benj. W. Greer, Sr., Dies,” *Evening Public Ledger*, October 29, 1920.

²⁹ *Fifth Industrial Directory of the Commonwealth of Pennsylvania* (Harrisburg, PA, 1925), 492; “Activities of Day in Real Estate,” *The Philadelphia Inquirer*, March 7, 1926.

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mill is not listed in any of the period industrial directories. The length of Ring's tenure is unknown, however a 1942 city land use map indicates that the J.D. Murphy Woolen Mills then occupied the complex. The 1950 Sanborn map shows that the ownership of the property had changed once again, having then been occupied by the C.W. Jones Company, yet another woolen mill. Few mentions of either J.D. Murphy or C.W. Jones can be found in period newspapers and directories, suggesting that both companies had a minor presence in what was already a declining industry in Philadelphia.

By the late 1950s, the mill complex had been acquired by the Dittmar & Penn Corporation, manufacturers of surgical equipment, who had moved from their previous location at 811 N. 19th Street in the Francisville section of North Philadelphia. Dittmar & Penn continued to occupy the former mills until 1984, when the company donated the entire property to La Salle University. From the early 1990s until recently, Mill #1 housed La Salle's facilities department and was used sporadically for storage. From the late 1980s through the early 2000s, Mill #2 was leased to the Ehmke Manufacturing Company, manufacturers of heavy duty fabrics for use in commercial, industrial and defense applications.

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9. Major Bibliographical References

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Wiley, Samuel T. *Biographical and Historical Cyclopedia of Delaware County, Pennsylvania*. New York: Gresham Publishing Company, 1894.

Textile World's Directory of the Mill Trade in the United States. Boston: Guild & Lord, 1897.

Periodicals (Newspapers and Trade Journals)*:

American Wool and Cotton Reporter

The Daily New Era

Fibre and Fabric

Philadelphia Inquirer

Philadelphia Real Estate Record and Builders' Guide (PRERBG)

The Times

*see footnotes for specific citations

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Previous documentation on file (NPS):

- ☒ preliminary determination of individual listing (36 CFR 67) has been requested
☐ previously listed in the National Register
☐ previously determined eligible by the National Register
☐ designated a National Historic Landmark
☐ recorded by Historic American Buildings Survey # _____
☐ recorded by Historic American Engineering Record # _____
☐ recorded by Historic American Landscape Survey # _____

Primary location of additional data:

- ☐ State Historic Preservation Office
☐ Other State agency
☐ Federal agency
☐ Local government
☐ University
☐ Other
Name of repository: _____

Historic Resources Survey Number (if assigned): NA

10. Geographical Data

Acreage of Property ~3.0 acres

Latitude/Longitude Coordinates Datum if other than WGS84: NA

Latitude: 40.037242 Longitude: -75.159417

Verbal Boundary Description

The boundary of the property is shown as a dotted line on the accompanying map entitled "Site Plan with National Register Boundary" (**Figure C**).

Boundary Justification

The proposed National Register Boundary conforms to the historic parcel and includes all remaining resources that were historically associated with the Bellevue Worsted Mills.

Form Prepared By

name/title: Kevin McMahon, Associate organization: Powers & Company, Inc.
address: 1315 Walnut Street, Suite 1717, Philadelphia PA 19107
e-mail: kevin@powersco.net telephone: (215) 636-0192 date: March 22, 2021

Additional Documentation

Submit the following items with the completed form:

- **USGS map** or equivalent (7.5 or 15 minute series) indicating the property's location.
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

Bellevue Worsted Mills

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Photographs

Photo Log

Name of Property: Bellevue Worsted Mills

City or Vicinity: Philadelphia

County: Philadelphia State: PA

Photographer: Kevin McMahon

Date Photographed: November 18, 2020

<i>Photograph #</i>	<i>Description of Photograph</i>
1.	East elevation of Mill #1, view northwest
2.	East elevation of Mill #1, south end, view northwest
3.	North elevation of Mill #1, view southwest
4.	Rear of property, looking south to the boiler house
5.	South and west elevations of Mill #1, view northeast
6.	1 st floor of Mill #1, view southeast
7.	1 st floor of Mill #1, view south
8.	1 st floor of Mill #1, view northwest
9.	2 nd floor of Mill #1, view south
10.	2 nd floor of Mill #1, view southwest
11.	2 nd floor of Mill #1, view north
12.	2 nd floor of Mill #1, view north
13.	3 rd floor of Mill #1, view south
14.	3 rd floor of Mill #1, view north
15.	3 rd floor of Mill #1, view west
16.	3 rd floor of Mill #1, view southwest
17.	4 th floor of Mill #1, view west
18.	South and east elevations of Mill #2, view northwest
19.	South elevation of Mill #2, view north
20.	West elevation of Mill #2, view southeast
21.	Property west of Mill #2, view north
22.	1 st floor of Mill #2, view northwest
23.	2 nd floor of Mill #2, view south
24.	2 nd floor of Mill #2, view north
25.	2 nd floor of Mill #2, view south
26.	2 nd floor of Mill #2, view north

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

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C.	Site Plan with National Register Boundary.
D.	Building Chronology Plan.
E.	Aerial view by Dallin Aerial Survey, 1929.

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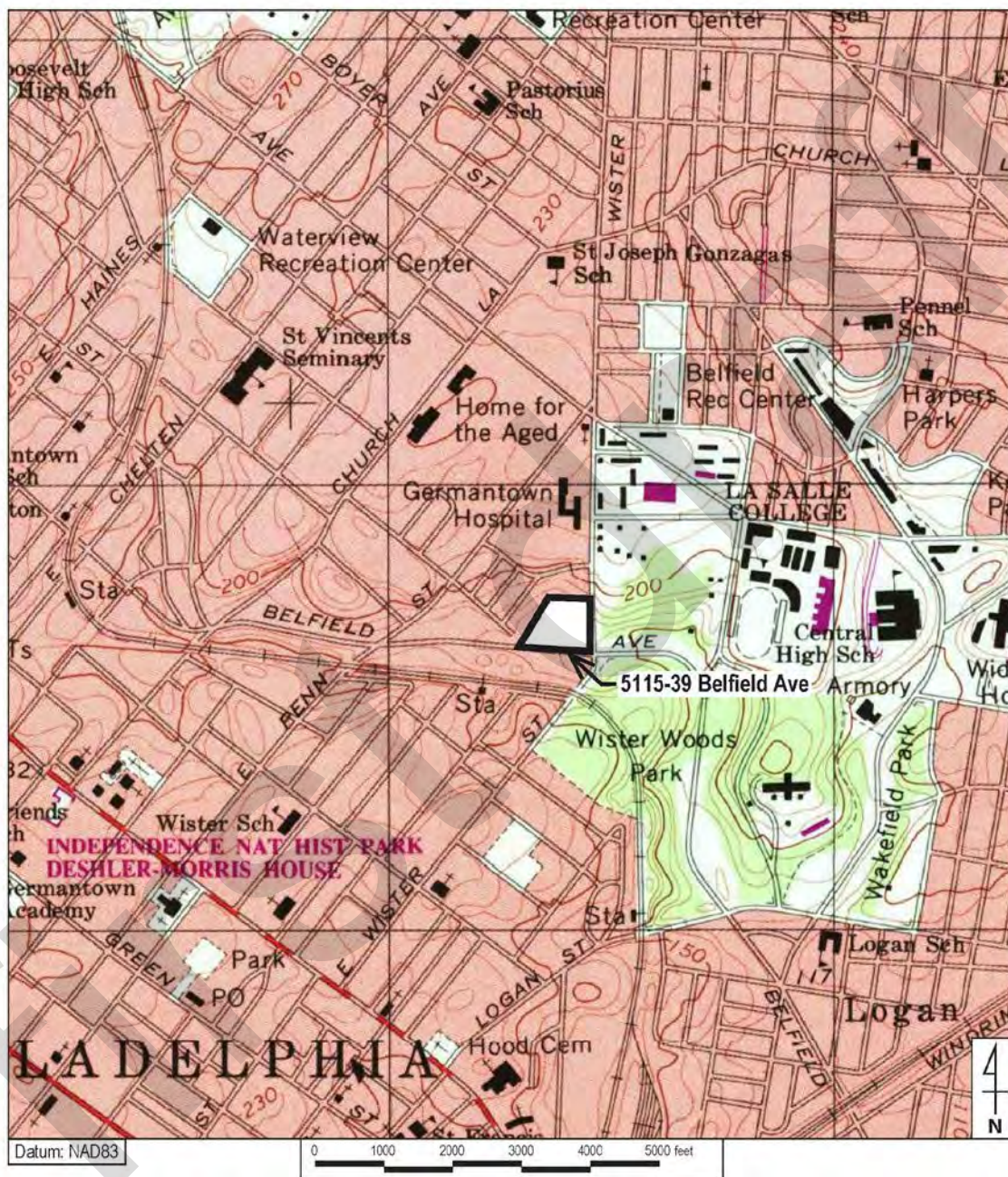
<i>Figure #</i>	<i>Description of Figure</i>
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2.	Hexamer General Survey #1029, surveyed 1876. 3D view.
3.	Hexamer General Survey #1029, surveyed 1876. Plan view.
4.	Hexamer General Survey #2278, surveyed 1889. 3D view.
5.	Hexamer General Survey #2278, surveyed 1889. Plan view.
6.	Trademark filed by Benjamin W. Greer in 1893.
7.	Hexamer General Survey #2718, surveyed 1893. 3D view.
8.	Hexamer General Survey #2718, surveyed 1893. Plan view.
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10.	Sanborn fire insurance map, 1924.
11.	USGS Map.
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USGS Map Excerpt - Germantown Quadrangle - Pennsylvania (1997)
Bellevue Worsted Mills
5115-5139 Belfield Avenue
Philadelphia County, PA

Lat. Long.
40.037242 -75.159417

Figure 11 – USGS Map Excerpt

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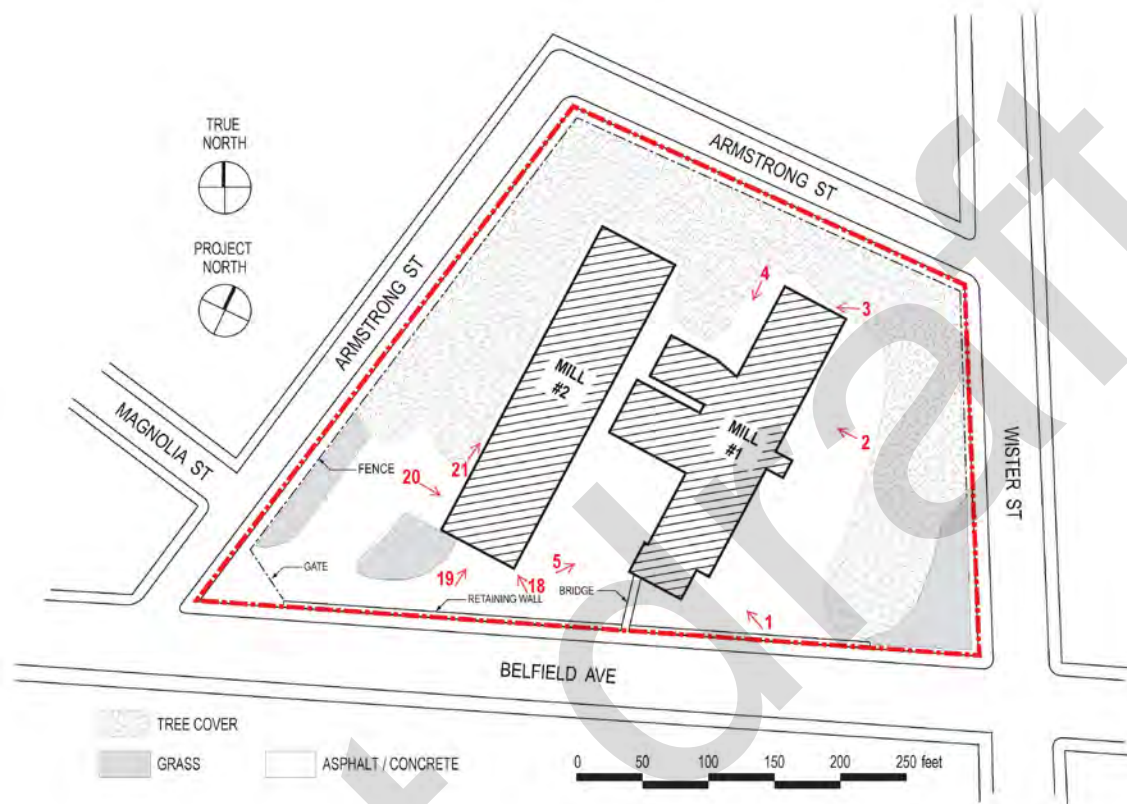


Figure 12 – Site Plan with NRN Boundary and Exterior Photo Key

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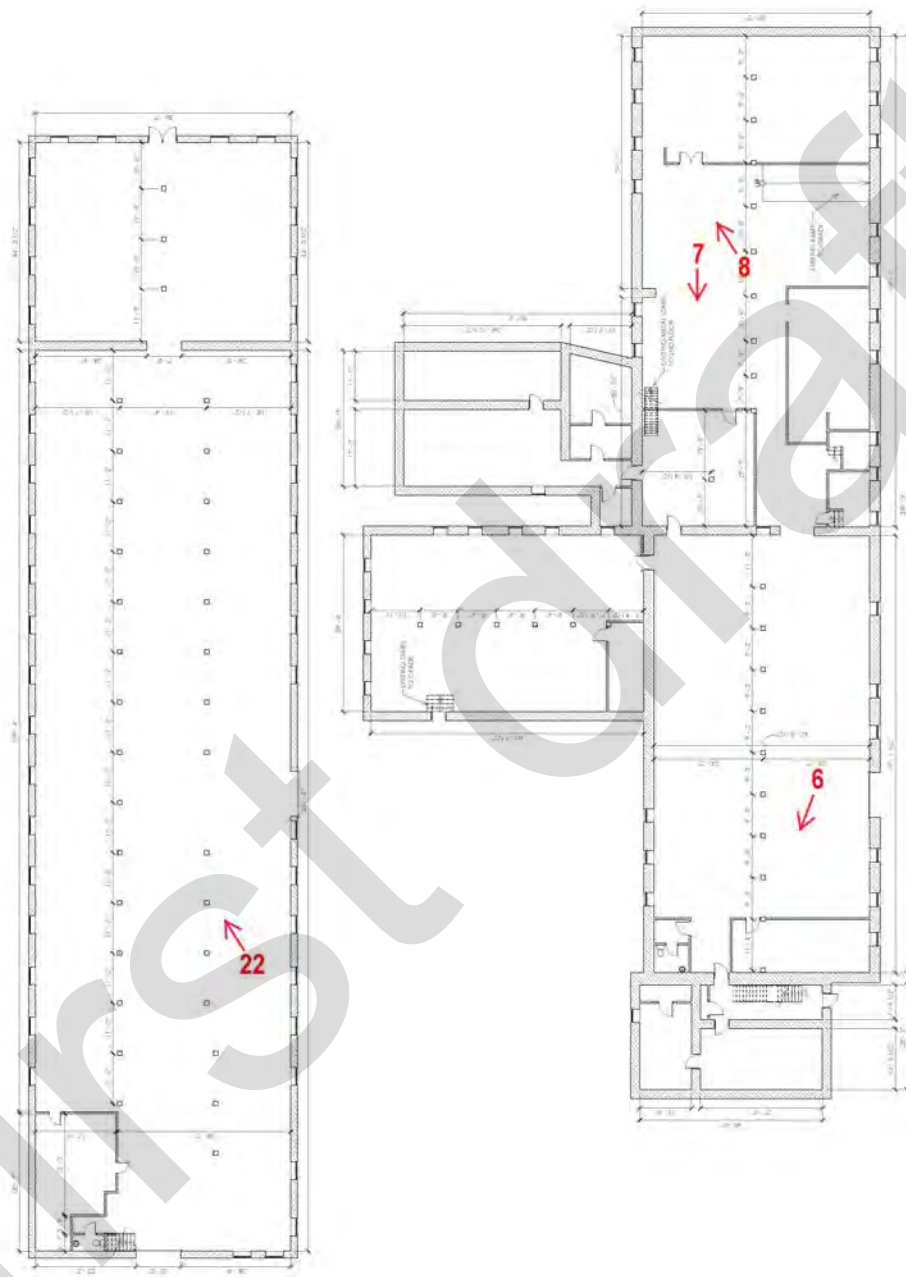


Figure 13 – First Floor Plan with Photo Key

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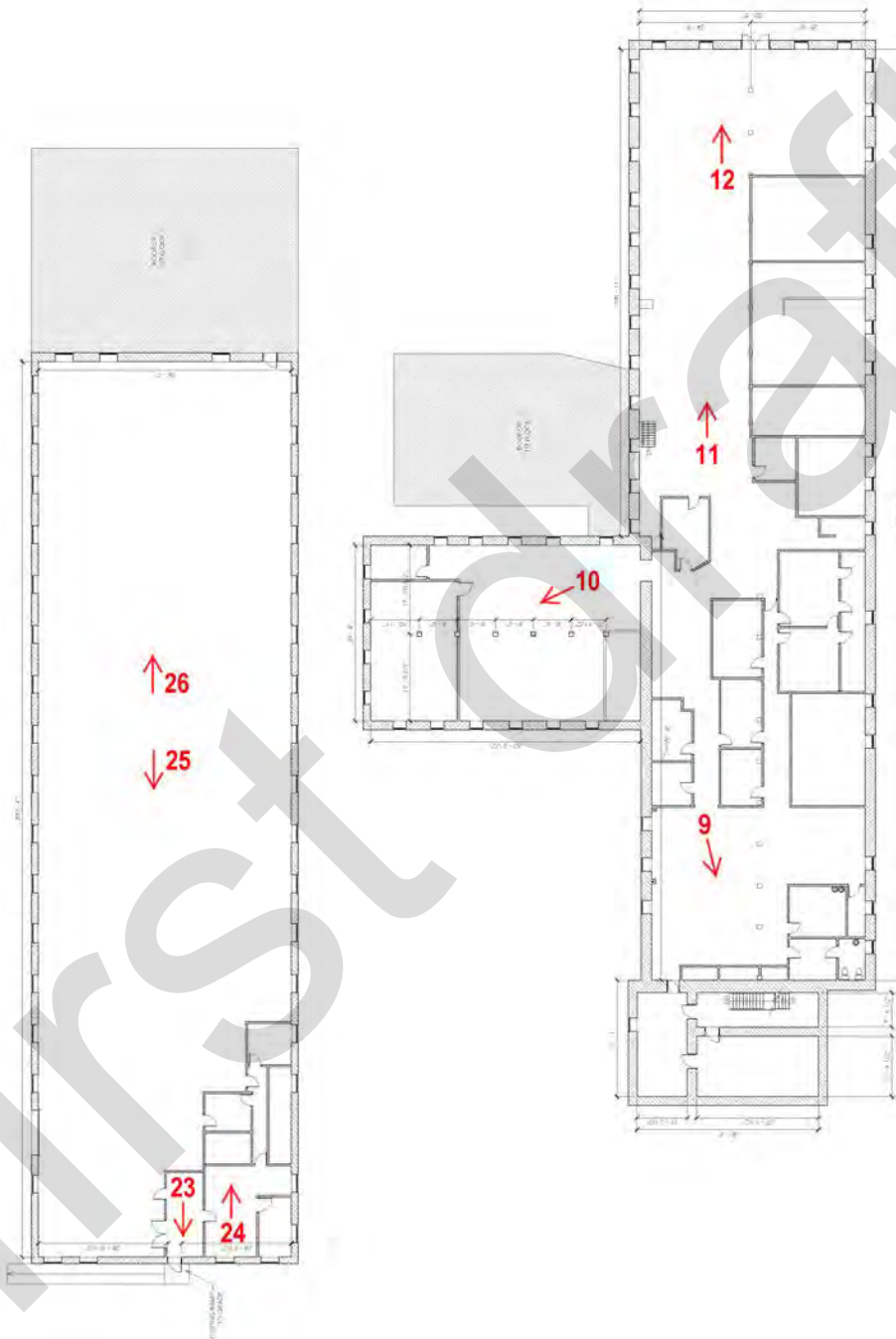


Figure 14 – Second Floor Plan with Photo Key.

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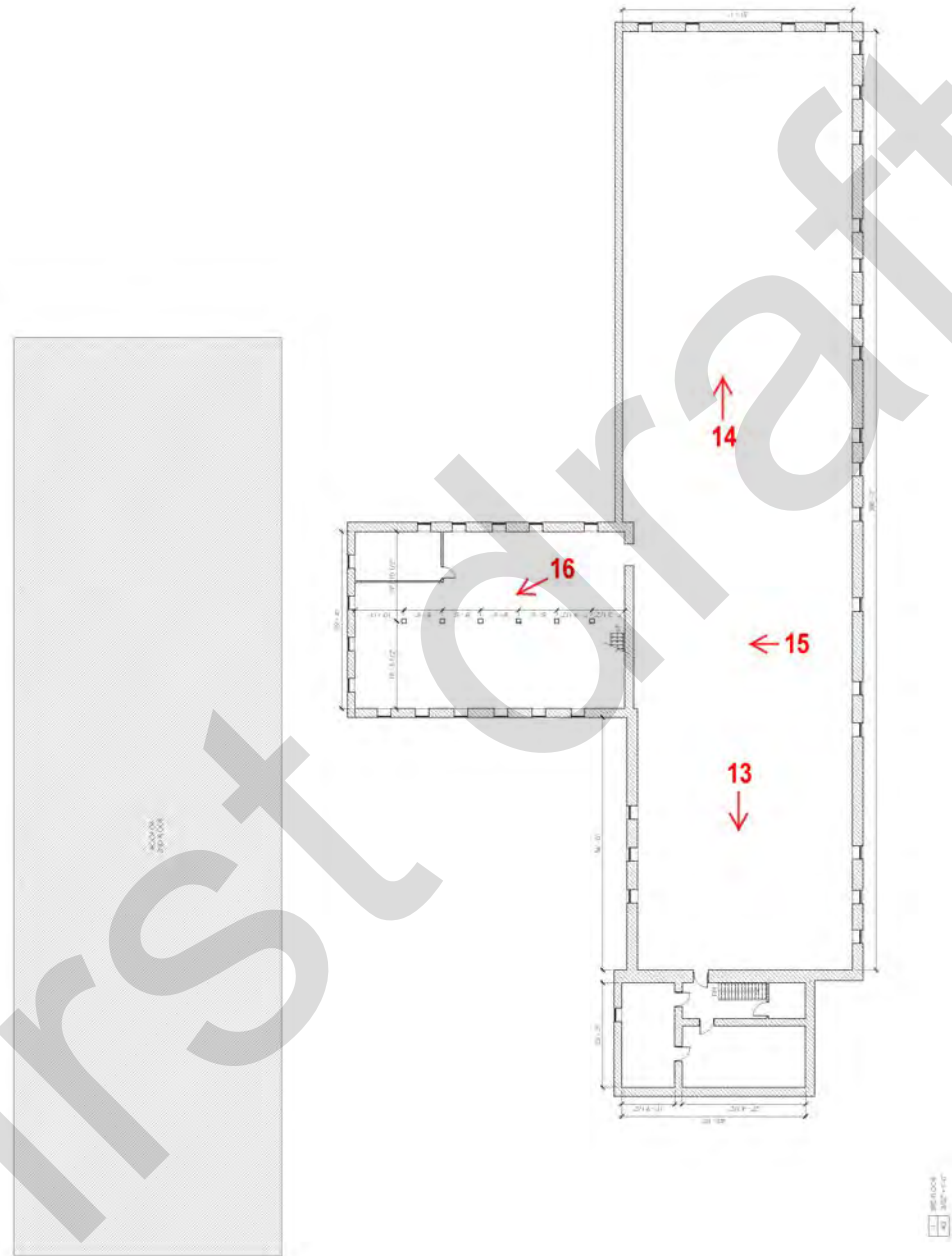


Figure 15 – Third Floor Plan with Photo Key

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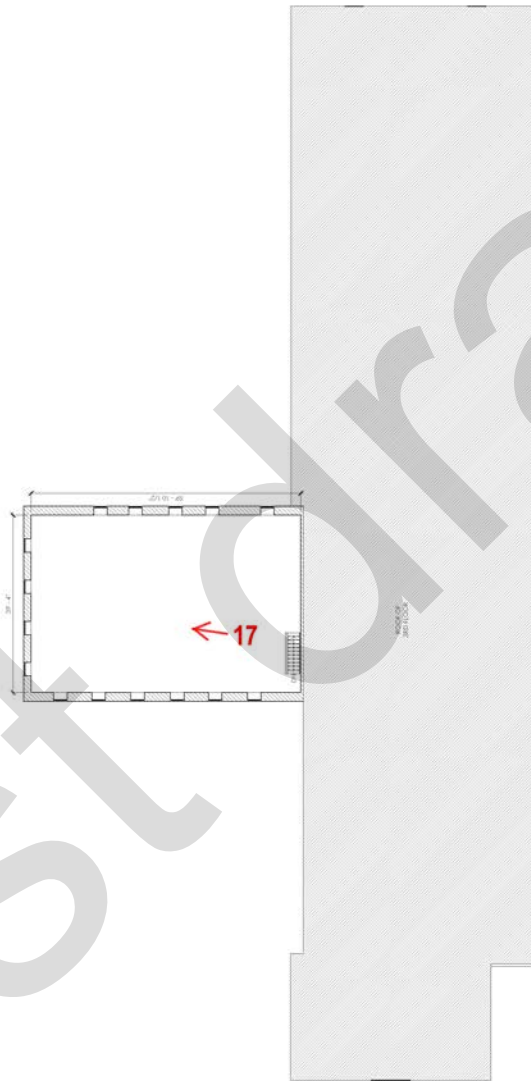


Figure 16 – Fourth Floor Plan with Photo Key.