VIA ELECTRONIC MAIL

Committee on Historic Designation
c/o Jonathan Farnham, Ph.D., Executive Director
Philadelphia Historical Commission
1515 Arch Street, 13th Floor
Philadelphia, PA

Re: Mercy Career and Technical High School

Dear Committee Members:

On September 21, 2022, the Committee on Historic Designation will consider the nomination of the building at 2901 W. Allegheny Avenue (a/k/a 2900 W. Hunting Park Avenue) to the Register of Historic Buildings, Places and Objects. Mercy High opposes the nomination and urges the CHD to refrain from recommending the nomination to the Historical Commission.

Since 1972, Mercy Career and Technical High School has provided, with extraordinary success, technical, vocational and career educational opportunities to a diverse student population from all parts of the City and many from challenged economic conditions. Erecting impediments to that effort would be contrary to an important public interest.

After thorough analysis, we conclude that the nomination provides no basis upon which a designation should be made. The histories and narratives presented are, for the most part, unrelated to the criteria necessary for designation. We have enclosed a brief analysis of our expert consultant.

Constructed in 1911-12, the building is now obsolete and insufficient to meet the Mercy High’s safety and curricular needs in the 21st Century as substantiated by a 2018 property condition analysis. Unable to acquire a more appropriate building, Mercy High is prepared to raise the millions of dollars necessary to renovate and improve the building. To do so will require expansion of portions of the rear and sides of the current building and likely removal of some historic fabric.
We ask the Committee to recognize that designation exposes Mercy High to unnecessary delay and expense that may come from the additional processes (including the prospect of years of litigation). Mercy High has been and will continue to be thoughtful stewards of its building.

We will present our position at the meeting and will answer questions you may have.

Respectfully,

/s/ Neil Sklaroff

Neil Sklaroff

Enclosures
MISSION STATEMENT & HISTORY
Mercy Career & Technical High School (Mercy Tech), a sponsored ministry of the Sisters of Mercy, is a private school providing a Catholic education and comprehensive academic, career and technical school experience that prepares students for the workforce and/or post-secondary education. In the Mercy tradition, faculty, staff and students live the Gospel in word and action and promote service to others. Mercy Tech graduates a highly competent, compassionate, contributing member of the global community.

We believe that:
- Every individual has inherent worth and dignity.
- Some students are blessed with gifts that are better served through a career and technical education.
- Risk-taking is essential for school improvement.
- Within a culturally diverse environment, we can build tolerance, respect, and understanding.
- Lifelong learning is a shared responsibility of students, teachers, family and community.
- We are called to serve others.
- All children are an investment in the future.

Since 1950 Mercy Tech has educated thousands of young men and women. Conceived originally as Mercy Technical School, the school moved in 1972 from its original location at the corner of Broad Street and Cecil B. Moore Avenue to its present location at 2900 West Hunting Park Avenue. In 1973, the school began offering high school diplomas in addition to technical certifications and changed its name to Mercy Vocational High School. The name changed again in 2016 to Mercy Career & Technical High School to reflect the school’s focus on best practices in career and technical education and on preparing its graduates with industry-recognized licenses and certifications for in-demand careers.

Mercy Tech is a private, non-profit 501 (c) (3) corporation founded in 1950 by the Sisters of Mercy and is currently certified by the Middle States Commission on Higher Education Association through December 2031 after completing a successful evaluation by the Commission in 2021.

EDUCATIONAL APPROACH
Mercy Tech is the premier career and technical high school in the Philadelphia region as measured by students graduating with industry-recognized licenses and certifications. We provide an immersive, project-based education that
prepares students for their next steps, whether that involves continuing their education after graduation or entering the workforce to start a career. The school, which is deeply rooted in the Catholic faith and in the mission of the Sisters of Mercy, is backed by a legacy of proven success.

Mercy Tech prepares students for rewarding careers and instills life-long values in its graduates. Nurturing and empowering the whole individual, Mercy Tech opens doors and creates opportunities, providing contemporary job options and a non-traditional path to higher education.

Mercy Tech currently offers the following seven career and technical education programs:

1. Advertising Art & Web Design
2. Building Trades
3. Business
4. Computer Technology
5. Cosmetology
6. Culinary & Pastry Arts
7. Health Occupations

The school’s primary purpose is to provide a values-based education to students whose educational and career goals are best served by a quality, comprehensive, career and technical high school education. Goals and objectives include:

- Providing students with marketable skills that will enable them to secure full-time work within their chosen career upon graduation.
- Giving students the academic foundation they need to pursue post-secondary education at a trade school, community college, or four-year college.
- Exposing students to current technology, including extensive computer training, giving them the skills necessary to meet the needs of employers.
- Providing students with the technological foundation to keep up with innovations in their fields.
- Offering opportunities for students to gain real-world work experience as conscientious, reliable employees through the school’s co-op program.

ACADEMIC PROGRAM
Mercy Tech offers an academic program designed to meet the education and career goals of students who have varied interests and abilities. Because this curriculum emphasizes both academic and career and technical education, Mercy Tech graduates—most of whom remain in the Philadelphia area—are well prepared to continue their education and/or join the region’s workforce.

Mercy Tech integrates technology into both the academic and career and technical curriculums. Since 2010, each student has been equipped with a
Chromebook during the school year. The faculty includes a Tech Team that researches, identifies, and provides training on integrating technologies in the classroom ensuring that the faculty provides the latest technology resources to students to help them succeed.

Mercy Tech students follow a core curriculum that provides the academic credits needed for a high school diploma. Integrated within the core subjects are themes of global awareness, financial and economic understanding, civic responsibility, environmental consciousness, and health and wellness. Students graduate with the necessary skills for success in the 21st century: critical thinking, collaboration, communication, and problem-solving. The academic curriculum gives students the foundation for post-secondary education and/or entry-level employment.

Students at Mercy Tech follow a core academic curriculum that includes the following academic subjects:

- English - Four Years
- Mathematics - Four Years
- Theology – Four Years
- Science - Three Years
- Social Studies - Three Years

Mercy Tech’s McAuley Program, named after Catherine McAuley, the foundress of the Sisters of Mercy, provides intensive academic support for students with diagnosed learning disabilities. The curriculum focuses on the development of the essentials for success in each academic subject. The McAuley Program teaches students learning strategies that allow them to achieve greater success with their high school studies. Students ‘graduate’ from the McAuley Program when they have built the skill sets needed to succeed in a traditional academic setting. Approximately 20% of Mercy Tech students participate in the McAuley Program.

**POPULATION SERVED**
Mercy Tech’s enrollment for the 2022-23 school year is 330 students, an increase of 13% over the prior year and is open to all eligible students regardless of income, sex, sexual orientation, race, religion, and national or ethnic origin. We are proud to serve a culturally, ethnically and racially diverse student body as summarized below:

- 54% Female
- 46% Male
- 61% Black/African American
- 15% Latinx
- 14% White
Mercy Tech is located in the Allegheny West neighborhood of North Philadelphia. The school’s location reflects its commitment to its urban mission while providing students with easy access via public transportation from neighborhoods across the city. Students come from 43 zip codes with 98% of students living in Philadelphia.

### Students come from the following neighborhoods:

- **North Philadelphia** 25%
- **Germantown/Mt. Airy** 20%
- **NE Philadelphia** 18%
- **Roxborough/Manayunk/East Falls** 9%
- **Kensington/Port Richmond** 7%
- **West Philadelphia** 6%
- **Southwest Philadelphia** 6%
- **Center City & Fairmount** 4%
- **South Philadelphia** 3%
- **Counties Surrounding Philadelphia** 2%

### SERVICE

The concept of service to the community is an integral part of a Mercy Tech education. We require freshmen and sophomores to complete 10 hours of service to others in their out-of-school hours during the academic year. Juniors and seniors are required to complete 15 hours of out-of-school service during the academic year. Therefore, a Mercy Tech student would engage in at least 50 hours of community service by graduation.

Students have opportunities to satisfy out-of-school service hours by participating in the school’s annual Operation Katrina project, which occurs every year during the Easter break. In the past, students traveled to New Orleans to help with clean-up and rebuilding after Hurricane Katrina, to central New Jersey after Hurricane Sandy, and to Lumberton, North Carolina to help in the aftermath of flooding there.

Given continued concerns and uncertainties around COVID-19, Mercy Tech students remained in Philadelphia this year to provide much needed support in our own communities. Students spent two days in mid-April providing help at Mother of Mercy House in Kensington, Casa del Carmen, and DePaul USA’s St. Raymond House and St. Joseph House. Building Trades students built clothes racks for closets and painted, while other students sorted donated baby clothes. Students organized a food pantry and assisted with food distribution. They also
did gardening, mulching, and outdoor cleanup.

In collaboration with Sister/Doctor Karen Schneider, a Sister of Mercy affiliated with The Johns Hopkins Hospital, and a local pharmacy, Mercy Tech hosted seven Covid-19 vaccination events at the school since May 2021 for students as well as members of their household and many other members of the community.

Working with people needing support helps students develop skills and compassion. They also experience the tremendous satisfaction that comes from helping others.

GRADUATE OUTCOMES
The chart below shows the Class of 2022’s post-graduation plans vs. previous years:

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<td>Four-year colleges</td>
<td>42%</td>
<td>37%</td>
<td>37%</td>
<td>42%</td>
<td>44%</td>
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<td>Two-year colleges</td>
<td>14%</td>
<td>29%</td>
<td>21%</td>
<td>10%</td>
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<td>Trade Schools/Training Prgms</td>
<td>5%</td>
<td>5%</td>
<td>18%</td>
<td>7%</td>
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<td>Military</td>
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<tr>
<td>Employment</td>
<td>12%</td>
<td>14%</td>
<td>15%</td>
<td>27%</td>
<td>20%</td>
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<td>FT Employment &amp; PT School</td>
<td>21%</td>
<td>5%</td>
<td>3%</td>
<td>8%</td>
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<tr>
<td>Undecided</td>
<td>1%</td>
<td>5%</td>
<td>1%</td>
<td>6%</td>
<td>3%</td>
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MEETING THE REGION’S NEEDS
Mercy Tech opens doors and creates opportunities for its graduates by providing contemporary job options and a non-traditional path to higher education that reduces or eliminates the need for student loan debt. In addition to attending traditional four-year colleges, Mercy Tech graduates have the ability to begin their careers at in-demand jobs, to attend community college or trade school at low or no cost, and/or to take advantage of employer-funded post-secondary education. These options provide a more cost-effective path to higher education and career development than traditional college preparatory high schools and are of particular benefit for students from low-income families.
Since 1950 Mercy Tech has served an urban population with special challenges. Currently, 98% of Mercy Tech students come from families with very limited financial resources and receive substantial financial aid to reduce their tuition cost. Too many students leave the city’s under-resourced public high schools and find themselves without the skills they need to be employable. Mercy Tech provides an environment that addresses students’ needs while preparing them to enter the workforce immediately upon graduation or after completion of a postsecondary program.

Of the ten largest cities in the United States, Philadelphia has the highest rate of residents living in poverty at 23%, which is double the national average. Mercy Tech students reflect that reality and require generous financial as the median household income of entering freshman in 2022 was $38,000.

The total cost of education for a Mercy Tech student is approximately $14,000 and our tuition is $8,900 per student. On average, after financial aid awards, our families pay approximately $2,500 per student. The funding required to cover this financial gap is provided by the support from our many generous and dedicated benefactors along with the assistance provided by the Pennsylvania EITC and OSTC tax programs.

For many years all students have been invited to share their insights and opinions regarding their experience attending Mercy Tech. Invariably their responses reflect two major attributes: they feel safe in the school and they are very grateful for the dedication and personal support provided by faculty, counselors and staff. A statistic that supports this view is that the average daily attendance percentage of our students for many years before the pandemic was typically in the high 90’s. For the 2021/22 school year the percentage was in the mid 90’s as we came out of the worst of the pandemic impact and our goal for the school year 2022/23 is to return to the high 90’s again.
Timeline

Early in 2018, as Mercy Tech was approaching its 50th year in the school’s 100+ year old main building at 2900 West Hunting Park Avenue, the Mercy Tech Board of Trustees approved an evaluation of the building in order to begin planning for the next fifty years. In September 2018, the architectural firm KCBA presented to the Board a Facilities Study prepared by them with input from a Civil Engineering and a Mechanical Engineering consultant.

The Facilities Study outlined an extensive range of necessary improvements to the infrastructure of the building including an analysis of site conditions, building exterior, HVAC, plumbing, electrical and roofing. KCBA recommended major upgrades in all these areas.

In March 2019, the Mercy Tech Board approved the appointment of Jones Lang LaSalle to represent the school in a search for potential new building sites or existing buildings which could be an alternative to rehabbing the existing facility.

In December 2019, Mercy Tech entered into a Letter of Intent with The Goldenberg Group to construct a new school building at their Logan Triangle location near Ninth and the Roosevelt Blvd. in North Philadelphia.

During November 2019 through March 2020, Schultz & Williams conducted a fund raising feasibility study to determine the feasibility of raising sufficient funds from Mercy Tech donors.

The Covid-19 shutdown began in March 2020 causing, among many other things, most of our donors to put a pause on major commitments pending the duration of the pandemic. As a result, the plans to move forward with construction of the new building were put on temporary hold in early April 2020. As the pandemic persisted through 2020 and 2021, costs of new construction began to rise dramatically and our donors remained tentative with regard to making major commitments during uncertain economic times. In April 2022 we advised The Goldenberg Group that we would be withdrawing from the Logan Triangle project due to escalating costs and uncertain fund raising capacity.

At the Mercy Tech Board meeting in May 2022, a decision was made to revisit the KCBA plans from 2018.


Current Plans

As we consider fulfilling the Mercy Tech mission for the next 50 years at our current location we are guided by the need to modernize the existing classroom facilities to demonstrate our commitment to 21st century education. The building was constructed to serve as an orphanage in 1911 and was retro-fitted to serve as a school building by Mercy Tech in the 1970’s. We are achieving remarkable things in our classrooms but it is time to fully rehab classroom and administrative space to project a more modern educational facility and to remain competitive with other Philadelphia educational institutions. At the same time we are very conscious of the need to continuously monitor and improve the security of the facility in a neighborhood in North Philadelphia which presents significant security risks.

We have engaged a construction manager, an HVAC firm, a mechanical/civil engineering firm and a roofing contractor to do a thorough evaluation of our main building to determine the costs associated with implementing the core infrastructure recommendations made by KCBA and the cost of the wide scope of renovation required to bring the building up to code and in compliance with current ADA requirements. Specific items currently under evaluation include:

- New HVAC system
- New sprinkler system
- New roof
- New windows
- Plumbing upgrade
- Electrical system upgrade

KCBA also recommended an exterior building addition on the southwest portion of the building (not affecting the Hunting Park Avenue façade) to provide a new secure, accessible school entrance, a staircase, administrative offices, and additional classroom space. See renderings attached.

The KCBA plans also called for revising the interior demising walls to accommodate more functional classroom spaces, wider hallways, and improved offices for instructional and staff personnel. See renderings attached.
MAIN BUILDING

EXTERIOR RENDERING
Inadequacies of the Nomination for The Catholic Home for Destitute Children / Mercy Tech

Prepared by:
CivicVisions, LP
September 18, 2022

Prepared For:
Neil Sklaroff, Esq.
Dilworth Paxon LLP
Inadequacy of the Nomination for The Catholic Home for Destitute Children / Mercy Tech:

It is the contention of this analysis that the nomination filed about the present Mercy Tech High School at 2901 W. Allegheny Avenue is inadequate and should be rejected because it does not provide comparisons or context for the claimed criteria. Nominations for institutions present a significant risk of costs and reduced capacity for the institution to meet the changing situation of the future. This is particularly significant when the building in question, the former Catholic Home for Destitute Children, is already an adaptive reuse serving as a technological high school in the shell of an aging orphanage that is outdated and in need of massive outlays in funds to bring the building up to contemporary codes and modern institutional uses.

This very brief analysis does not examine and cite the numerous errors and specific weaknesses of the nomination; instead its intention is to demonstrate the nomination’s failure to substantiate any link to the criteria under which the building is being proposed for designation. It is important to note that the criteria all call for a designated property in one way or another to be more than average, to have some degree of significance that makes its designation of value to the city. This nomination fails to make a case for any of the criteria.

Criterion A – Has significant character, interest or value as part of the development, heritage, or cultural characteristics of the City....

Criterion D- Embodies distinguishing characteristics of an architectural style...

Criterion E – Is the work of a designer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the City....

Criterion H – Owing to its unique location, ... it represents an established and familiar visual feature of a neighborhood....

**Fails to establish how this building is significant in the context of Roman Catholicism institutional development in Philadelphia to meet Criterion A**

While the nomination places the institution in the overall sequence of the orphanages and charitable institutions operated by the Roman Catholic diocese, there is no attempt to explain the particular significance of this building within the category or to explore the evolution of the building type. Much irrelevant discussion describes the movement of the institution from its original site blocking the route of the Parkway. That original site was accessible in the urban center of the city. The removal of the building to 29th Street and Hunting Park Avenue appears to have been done for reasons of the relative inexpensiveness of the site in the midst of an industrial district rather than for health or other reasons.

The nomination needs a broader understanding of the history of orphanages as social policy but also as negative markers of social and cultural identity, with reference to the often punitive character of public care that was architecturally represented as a place for those failing to thrive in society. See Lawrence Vale, *From the Puritans to the Projects* (Harvard University Press, 2000).

In addition there is an extensive bibliography about orphanages in E. Wayne Carp, “The History of Orphans and Orphanages in the United States,” a recent volume in *Adoption and Culture* (v. 4, 2014). Among the sources cited are Leroy Ashby *Saving the Waifs: Reformers and Dependent Children, 1890–1917*. Philadelphia: Temple UP, 1984; a review of this and other books on the topic by Michael B. Katz of the University of Pennsylvania’s History...
Department is available in “Child Saving,” *History of Education Quarterly* 26: 3 (Fall 1986), 413-424.

Presumably institutions like the Catholic Home for Destitute Children stimulated the far richer and more sustainable environment of the Carson Valley School (1917) with its evocative cottage architecture by Albert Kelsey. By the 1890s, Philadelphia had built numerous institutions for orphans and destitute children – the most magnificent of which was of course the great campus for the Girard College by Thomas Ustic Walter, enlarged with dormitories by James H. Windrim and continuing into the 20th century with Thomas, Martin’s great auditorium. Later examples of private philanthropy in the region include Frank Furness’s rural campus for the Williamson Free School of Mechanical Trades in Elywn which provided separate “houses” to provide family-like settings; the Catholic Boy’s Protectory, by the Wilson Brothers (1898) in Montgomery County; and the Carson Valley School. Some discussion of the origins and evolution would certainly be appropriate.¹ Other sites for disadvantaged students include Cope & Stewardson’s Overbrook School for the Blind, and the extensive campus for the Pennsylvania School for the Deaf that began in center city on Broad Street and then received its major campus by the Wilson Brothers in Mt. Airy.

A second line of investigation that should have been included is the question of gender and its impact on facilities and care. Lacking this discussion, the case of the significance of this institution is unproven. Bonding young preteen girls to authority figures was not a practice then or now that warrants the reward of designation.

Fails to explain how this building is exemplary of the specific architectural style to meet Criterion D

The discussion of how the building has “distinguishing” characteristics of an architectural style begins with a poorly understood history of the origins of English Gothic that misses the signal contribution of Guillaume de Sens (William of Sens) who is credited with bringing the core of the new French Gothic style while simultaneously transforming it away from the quadripartite vaults of the French prototypes leading to the distinct English manner.

The extensive discussion of the entrance gate tower at Hampton Court is irrelevant and misses the significant differences between the fifteenth century sources and the 12th century Gothic. In particular, the origins of the towered gate with features that recalled its defensive purposes – including projecting towers with slit windows for archers and oriel windows projecting above the portal are part of a larger history of the shift in the late 15th century toward a more domestic and less martial architectural character. The linkage between domestic and military design is treated in Maurice, Howard, *The Early Tudor Country House: Architecture and Politics 1490–1550*, (1987) and there are other excellent sources that would benefit the understanding of the building type.
The specific role of the feature which is entirely ignored in the nomination is the use of the towered gate as an emblem and boundary for English colleges which then led to its becoming a motif of consequence in later academic architecture. In the Philadelphia region this began with the firm of Cope & Stewardson who became leading academic architects of the day with a national practice that extended from Princeton College, now University, and west to St. Louis. Their earliest use of the towered gate began at Bryn Mawr College where they used the motif as entrances through the wall of dormitories that bounded the campus along Merion Avenue beginning with Pembroke (1894) and Rockefeller Halls (1904) and then extended to Blair Hall at Princeton, the University of Pennsylvania dormitories, and in 1900 the gateway to Washington University in St. Louis. There the specific source came from John Stewardson's visit to the University in Cambridge with its St. John's College that was marked by a gate that was used repeatedly by the architects.

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With many of the signature buildings of elite academic institutions of Philadelphia marked by the feature, it is not surprising that other institutions including public schools incorporated the motif. Examples follow:

W. Philadelphia High School, Henry de Coursey Richards, 1911, 46th and Walnut Streets – east and west entrances

Henry deCoursey Richards, Southwark School, 1909, 1835 S. 9th Street
These examples all predate the Catholic Home for Destitute Children and are presumably the source rather than an English castle.

Some additional background understanding of what gate towers were intended to symbolize would go a long way toward understanding its use. Obviously there is a counter narrative in which the purpose is enclosure— not unlike the use of the form in various prisons. Another component of the use of the style reaches back to August Welby Pugin’s theories about the Gothic Revival as an architecture that represented Christianity and by extension charity.\(^3\) None of these issues are explored in this essay.

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\(^3\) A. W. N. Pugin, *Contrasts: or a parallel between the architecture of the 15\textsuperscript{th} & 19\textsuperscript{th} centuries* (1836) lays out the argument that modern (i.e. 19\textsuperscript{th} century architecture) missed the social concerns of the true Gothic.
adventurous use of Italian Baroque stylings for several of his early churches that went against the mid-19th century hostility to the Baroque that was only gradually undone when it was re-evaluated by Swiss historian Heinrich Wölfflin as the counterpart to the Renaissance in Renaissance und Baroque (1888). There he argued that instead of being bad classicism, Baroque was an important emotive and expansive counter, more recently connected to the Counter Reformation making it more than a simple opposition to the standard classicism of the Renaissance. But before Durang's use Baroque, by its name was simply bad architecture.

Durang's 1860s St. Charles Borromeo Church on S. 20th Street in South Philadelphia marked an effort to incorporate the forms and details of Italian architecture as a marker of Roman Catholicism and national identity. Of even greater interest was Durang's incorporation of elements in plan and elevation of the Baroque Church of the home church of the Jesuit Order, Il Gesu by Giacomo Vignola (1551). That church has a peculiarity in plan in which the side aisles pass through side chapels, a motif which UPenn historian Robert Smith called "crypto-collateral side aisles." Interestingly Durang's church incorporated that feature in his church of 1876 for the Jesuit Order, suggesting that he had looked at the plans and brought the feature to Philadelphia. Of equal note are the English Gothic characteristics of the Roman Catholic High School on north Broad Street (1890).

Each of these buildings possesses architectural qualities that are at odds with much of Durang's later works in which his office became essentially a production office for the Archdiocese with largely repetitive plans and little apparent consideration of site, nationality, or purpose. Given the late date of the Orphanage in Durang's career and its relationship to multiple institutional designs by Durang, there is nothing in the nomination that demonstrates that this building merits designation. It appears instead to denote an architectural practice that had gotten old, tired, and was no longer capable of innovation.

Fails to demonstrate that this location is so unique that it merits designation on the grounds of Criterion H

The nomination appears to make the case that any triangular site is of such significance that any building on a triangular lot merits designation. Presumably this is in recognition of the
gridded nature of the city plan – but it leaves out the hundreds of triangular sites created across the entire city by the great diagonal avenues – Lancaster, Woodland, Baltimore on the west side of the city, Passyunk, Moyamensing, Penrose Avenues, Roosevelt Boulevard, Glenwood, Ridge and Germantown Avenues, to name only the best known, that cut across the city fabric. More than a few of these sites are intersected by multiple streets creating similar situations to the site of the school across the entire city.

Hunting Park triangular sites: 1942 Land Use map showing triangular site as a function of diagonal streets cutting through the grid.

Passyunk Avenue diagonal, triangular sites, 1942 Land Use map showing triangular site as a function of diagonal streets cutting through the grid.
There are dozens, perhaps hundreds of triangular sites in Philadelphia, many intersected by multiple streets. The 2900 Hunting Park Avenue site is not so unique as to warrant designation – nor can it be the intention to have any “familiar” site be designated. Again, so doing would remove all standards. Presumably the intention is to recognize sites on particularly important streets or locations – such as the Benjamin Franklin Parkway, or Broad Street.

Larger social and cultural criteria for designation
In so far as nearly every school has graduates and every church has a congregation, and all have institutional histories and are typically large buildings that have presence in the urban setting, the question has to be raised of appropriate boundaries to designation. In the instance of the 1986 Multiple Resource National Register nomination for the public school
buildings of Philadelphia, it should be recalled that the nomination was created so that potential buyers of redundant school buildings could take historic tax credits for the renovation of the building, thereby creating additional value for the school district when they sold building and an incentive for buyers. Insofar as city designation does not provide such advantages while creating significant costs and risks, the dangers of nominations to institutions with vast numbers of buildings might be addressed in other ways that would benefit the city and its institutions.