



**PHILADELPHIA
ARCHAEOLOGICAL
FORUM**

January 23, 2023

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

Re: Concerns regarding applications being considered at the January 24, 2023 Architectural Committee meeting

Dr. Farnham,

The Philadelphia Archaeological Forum is submitting this letter to voice our concerns regarding the two projects being considered by the Architectural Committee during the above regularly scheduled meeting:

700-02 and 704 Chestnut Street
647 North 16th Street

The first of these projects is located within the Chestnut Street East Historic District which was listed on the Philadelphia Historical Register, in part, for its potential to contain significant archaeological sites and resources (Criterion I). Our organization believes that this and project should not be considered either by the Architectural Committee or the full Historic Commission until the applicants has submitted documentation that a qualified archaeologist has assessed the project's potential for impacting or potentially destroying buried archaeological resources. If it is determined that potentially significant archaeological resources are likely to be present then either: 1) steps should be taken, in consultation with a qualified archaeologist, to limit or avoid proposed construction related disturbance to those resources, or 2) appropriate archaeological investigations should be completed in advance of, or in conjunction with, planned demolition and new construction in order to mitigate the effects of likely impacts to buried archaeological resources.

The property at 647 North 16th Street falls within ground occupied by two different, but overlapping 19th century historic cemeteries – The House of Refuge Burial Ground and the Hedding Methodist Episcopal Church Cemetery (refer to the PAF's Historic Philadelphia Burial Places Map; https://www.phillyarchaeology.net/wp-content/gismaps_maps/BurialMapV4/index.html#12/40.0102/-75.1089). While it is likely that some prior effort was made to relocate graves within these burying grounds to other cemeteries, there can of course be no guarantee that all of the interments were relocated, and it remains possible that some number of burials could be still preserved in the open back yard of the 647 N. 16th Street property. Numerous cases of have been documented in this city of former

PHILADELPHIA ARCHAEOLOGICAL FORUM

c/o Glen Muschio
Drexel University, 3141 Chestnut Street 13-608, Philadelphia, PA 19104
www.phillyarchaeology.org • phillyarchaeology@gmail.com

burial grounds, including those that had supposedly been relocated, where intact graves were subsequently disturbed during construction activities. Because neither the Architectural Committee nor the Historical Commission possesses the legal ability or statutory authority to approve new construction projects that have the potential to disturb unmarked graves and human burials, the PAF requests that further consideration of this project be tabled until the applicants or their representatives contract with a qualified archaeological firm - one with experience in dealing with unmarked cemeteries and burials – and determine whether or not any burials are still preserved within the property. If unmarked burials are present, no action to remove those remains and/or any associated funerary artifacts until the Philadelphia Orphans' Court is petitioned and issues a decree authorizing such removal and reburial elsewhere.

Submitted on behalf of the Philadelphia Archaeological Forum by,

A handwritten signature in blue ink, appearing to read "Douglas B. Mooney". The signature is fluid and cursive, with a long, sweeping tail that extends downwards and to the right.

Douglas B. Mooney
President