

Public Comment for 2313 Green Street



RICHARD C. DEMARCO
Member PA BAR
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Direct line: 267-362-1311

February 8, 2024

Via Email Only jon.farnham@phila.gov

Jon Farnham, Executive Director
Philadelphia Historical Commission
Philadelphia, PA 19107

RE: 2313 Green Street (the Property)-Letter Brief in Opposition to the Proposed Addition/Demolition.

Dear Jon:

As you know, I have just been retained as legal counsel for Thomas A. Leonard, III Esquire and his wife Kathleen (together referred to as the Leonard's), who reside at 2315 Green Street, which is the property immediately abutting the subject property to the west, which has a hearing before the Historical Commission (the Commission) on February 9, 2024. Please accept this letter brief for consideration by the Commission at the February 9, 2024 meeting, should the many requests for a continuance of the meeting not be granted.

The Ordinance Requires that the Matter be Postponed.

First, should the continuance not be granted, the February 9, 2024, hearing will not be consistent with procedural due process or the Ordinance, since the abutting property owners, the Leonard's, and their counsel, will not have had adequate time to prepare for the meeting. The Leonard's, as the owners of the immediately abutting property to the west, will be substantially and adversely impacted by the proposed addition on the Property. The addition will loom over their property and their open space, which is beautiful garden and yard. The proposal also involves demolition of a structure which attaches to the Leonard's rear carriage house, potentially threatening that structure. Despite these impacts, no notice of these proceedings were ever provided to the Leonard's, which is in violation of Section 14-1005(3) of the Historic Preservation Ordinance (the Ordinance). That section provides as follows:

(3) Demolition Notice.

When a person applies for a building permit involving demolition, L&I shall post, within seven days, notice indicating that the owner has applied for a building permit to demolish the property; that the property is historic or is located within a historic district; that the application has been forwarded to the Historical Commission for



review. The notice shall be posted on each street frontage of the premises with which the notice is concerned and shall be clearly visible to the public. Posting of a notice shall not be required in the event of an emergency that requires immediate action to protect the health or safety of the public. No person shall remove the notice unless the building permit is denied or the owner notifies L&I that he or she will not demolish the property.

This project specifically involves the demolition of the rear portion of the Property. *The posting referred to in the above Section was never done.* Accordingly, adequate notice was not provided to the Leonard's (or any other immediate neighbors), and they have been severely prejudiced in their ability to prepare for this hearing, having heard about this proposal only a few weeks ago, in late January.

Second, the Commission clearly has the authority to postpone this hearing for up to 6 months to allow the interested parties, the District councilman, the local RCO, and other neighbors (inter alia) to prepare for the meeting. Section 14-1005(6)(a)(3) of the Historic Preservation Ordinance states as follows:

(.3) Where the Historical Commission has determined that the purpose of this [Chapter 14-1000](#) may best be achieved by postponing the alteration or demolition of any building, structure, site, or object subject to its review, the Historical Commission may, by resolution, defer action on a building permit application for a designated period not to exceed six months from the date of the resolution. The Historical Commission shall inform the owner in writing of the reasons for its action. Where the Historical Commission acts to postpone the proposed alteration or demolition pursuant to § [14-1005\(6\)\(a\)](#), L&I shall defer action on the building permit application pending a final determination by the Historical Commission approving or disapproving the application.

In this matter, the local RCO, the Spring Garden Civic Association, the District Councilman Jeffery Young, and numerous additional impacted neighbors are seeking additional time to prepare for this critical proposal. The Leonard's have hired an engineer who will prepare a report which will be relevant to the Commission's decision. The proposal represents a material change to the abutting properties and the blocks surrounding it. This is a matter in which all interested parties should have sufficient time to consider the proposal and have an opportunity to be heard. Accordingly, the Commission should postpone the matter pursuant to the above section.

The Proposed Demolition and Construction must be Denied Pursuant to the Ordinance



With regard to the merits of this application, this proposed demolition and new construction is clearly inconsistent with the Ordinance and must be denied by the Commission. The relevant portion of the Ordinance, 14-1005(6)(d), states as follows:

(d) Restrictions on Demolition.

No building permit shall be issued for the demolition of a historic building, structure, site, or object, or of a building, structure, site, or object located within a historic district that contributes, in the Historical Commission's opinion, to the character of the district, unless the Historical Commission finds that issuance of the building permit is necessary in the public interest, or unless the Historical Commission finds that the building, structure, site, or object cannot be used for any purpose for which it is or may be reasonably adapted. In order to show that building, structure, site, or object cannot be used for any purpose for which it is or may be reasonably adapted, the owner must demonstrate that the sale of the property is impracticable, that commercial rental cannot provide a reasonable rate of return, and that other potential uses of the property are foreclosed.

The Leonard's disagree with Staff and the Architectural Committee's comments that the structure to be demolished is not "contributing" to the historic district. The structure is 70 years old and is consistent with the historic "carriage house" layout of the Leonard's property and several other properties on the block and within the historic district. It is erroneous for the Commission and its staff to deem the structure as "noncontributing." Since the garage on the property should be deemed contributing, pursuant to the above section, the demolition cannot be approved unless it is in the public interest or there is a hardship, neither of which is applicable to this case. Accordingly, the proposal should be denied outright pursuant to the above section.

Additionally, the Commission staff, highly trained professional individuals, experts in the field of historic preservation, have recommended DENIAL of the proposal. Their position is entitled to deference, and their position must be respected.

Furthermore, the new proposed construction is clearly not consistent with the Ordinance. Section 14-1005(6)(e) states as follows (in relevant part):

(e) Review Criteria.

In making its determination as to the appropriateness of proposed alterations, demolition, or construction, the Historical Commission shall consider the following:

- (.1) The purposes of this [Chapter 14-1000](#);
- (.2) The historical, architectural, or aesthetic significance of the building, structure, site, or object;
- (.3) *The effect of the proposed work on the building, structure, site, or object and its appurtenances;*



ZARWIN BAUM

DEVITO KAPLAN SCHAER TODDY

ATTORNEYS AT LAW

- (.4) *The compatibility of the proposed work with the character of the historic district or with the character of its site, including the effect of the proposed work on the neighboring structures, the surroundings, and the streetscape; and*
- (.5) *The design of the proposed work.*
- (.6) *In addition to the above, the Historical Commission may be guided in evaluating proposals for alteration or construction by the Secretary of the Interior's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" or similar criteria.*

(Emphasis added). Applying the above standards in the Ordinance, specifically Criterion (.3), the proposed construction towers over the open spaces on the Property, looms against the historic structure on the Property, and destroys and replaces the historic carriage house in the rear. The new building crowds and nestles immediately against the historic structure, destroying its significance. The new building also destroys the aesthetic open space and yard space within the Property. Clearly, this criterion is not satisfied.

With regard to Criterion (.4) above, the new construction places a large three-story new building within the Property's open space, destroying the character of the site. Additionally, the new construction will tower over the open spaces which characterize the Leonard's historic property (and other neighboring properties), and it will tower over and loom over their beautiful yard and garden. A photo of the Leonard's garden and yard is attached, along with a rendering of the new structure on the Property. The photo clearly illustrates how the new proposal will adversely impact "*neighboring structures, the surroundings, and the streetscape.*" Additionally, the new structure is clearly visible from Wallace Street, as shown in the second attached rendering provided by the applicant. This proposal clearly adversely impacts the streetscape and does not satisfy Criterion (.4) for the above reasons.

Lastly, the new structure also crowds and looms over the Leonard's rear carriage house, which is clearly historic in nature, and threatens its structure and viability. The two buildings are attached and connected by what is likely a party wall, and the demolition is likely to adversely impact the Leonard's carriage house. The Leonard's have engaged an engineer to evaluate the threat to their carriage house on their property posed by the new construction. This Commission should carefully consider this pending engineering report, and the adverse impact of the construction on the Leonards' historic property. Accordingly, Criterion .4 clearly requires denial of the proposal (and this matter should also be postponed to allow consideration of the engineer report).

The Secretary of the Interior's Standards compel denial of the proposal.

Additionally, Criterion .6 above requires the Commission to consider the Secretary of the Interiors Standards for Rehabilitation (the Standards). Those standards clearly compel the denial of the proposal. Those Standards are laid out below.



1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.



First, it must be noted that the Staff and Architectural Committee only considered standards 9 and 10 when considering this application. This is clearly erroneous. In addition to Standards 9 and 10, Standards 1 and 2 are clearly applicable.

With regard to Standard 1, this Standard is not followed by the proposal. The proposal completely alters the historic use of the property, creating a brand new structure which completely destroys the prior use of the property, which was a single structure with a small carriage house (a single family home) with beautiful open spaces and yard space. The new structure destroys the open space and yard on the Property which complements the historic structure. Standard 1 should have been considered by the Architectural Committee and wasn't - which was erroneous. The Commission should consider Standard 1 and deny the proposal.

With regard to Standard 2, this Standard is also not followed by the proposal. The historic character of the property is clearly NOT preserved. As stated above, the new structure will destroy the open space and yard which so nicely complements the historic structure. The proposal clearly alters the "features and spaces" on the Property by placing a new structure within a beautiful open space. The Standard also states that such alterations of the "features and spaces" (of the Property) should be "avoided." This proposal does not avoid such alteration, and clearly radically alters the character of the Property and its features and spaces. Thus, this standard is not followed by the new construction.

With regard to Standard 9, while the staff did recommend denial of the proposal pursuant to this standard, which we certainly agree with, the Committee did not follow the staff recommendation. This was erroneous. Standard 9 clearly compels denial of the proposal. More specifically, the new work is not "compatible with the massing, size, scale" of the Property, and the new work does not "protect the historic integrity of the property and its environment." To the contrary, the new work radically alters the massing, size, and scale of the property - vastly expanding it - virtually doubling the massing of the Property. It is impossible to determine other than the proposed alternation is not consistent with Standard 9.

The proposal also destroys the "environment" of the historic property. It adversely impacts the neighborhood, and most specifically, the Leonard's historic property. It also adversely impacts the streetscape and removes the beautiful open space on the property. The new structure also adversely impacts the Leonard's open spaces, yard and garden, and potentially threatens their historic carriage house.

Lastly, Standard 10 is also not followed by the proposal. The demolition of the rear structure results in the layout of the Property being lost forever. If the new construction is removed in the future, the Property is forever altered. This is clearly contrary to Standard 10.

CONCLUSION



ZARWIN BAUM

DEVITO KAPLAN SCHAER TODDY

ATTORNEYS AT LAW

For the above reasons, this Commission should postpone this hearing to allow all interested parties to prepare for the meeting. If the postponement is not granted, the Commission should deny the proposal. Thank you for your consideration of this matter.

Sincerely and respectfully,

ZARWIN, BAUM, DEVITO, KAPLAN
SCHAER, & TODDY, P.C.

By: /s/ Richard C. Demarco
Richard C. Demarco, Esquire

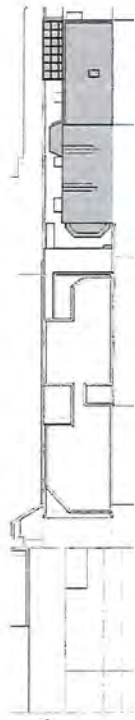
cc: Office of Councilman Jeffery Young
Spring Garden Civic Association
Allyson Mehley
LO Design



RENDERING



2313 GREEN STREET | SUBMISSION TO THE PHILADELPHIA HISTORICAL COMMISSION | 5 DECEMBER 2023



LO DESIGN



CITY OF PHILADELPHIA
CITY COUNCIL

JEFFERY YOUNG, JR.
COUNCILMEMBER 5TH DISTRICT

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Public Property and Public Works

February 8, 2024

Robert Thomas, Chair
Philadelphia Historical Commission
1515 Arch St.
13th Floor
Philadelphia, PA 19102

Via Email - preservation@phila.gov

RE: 2313 Green Street-Request for Tabling of the Historical Commission's Hearing Scheduled for
February 9, 2024

Dear Chairman Thomas,

I am writing to request that the Historical Commission once again table the vote for review of the property located at 2313 Green Street. There are a number of concerns that have been raised by near neighbors including the compatibility of the proposed work with the character of the historic district and the effect of the proposed work on the neighboring structures. Tabling this vote will allow for more discussion with the neighboring property owners to determine the impact of the proposed development.

Thank you for your consideration of this matter. Please feel free to contact my office with any questions.

In Service,

A handwritten signature in black ink, appearing to read "Jeffery Young, Jr.".

Jeffery Young, Jr.
Councilmember, 5th District

Cc: Jon Farnham (Via Email jon.farnham@phila.gov)



RICHARD C. DEMARCO
Member PA BAR
rcdemarco@zarwin.com
Direct line: 267-362-1311

February 7, 2024

Via Email Only jon.farnham@phila.gov

Jon Farnham, Executive Director
Philadelphia Historical Commission
Philadelphia, PA 19107

RE: 2313 Green Street-Request for Continuance of the Historical Commission's Hearing Scheduled for February 9, 2024.

Dear Jon:

Please note that I have just been retained as legal counsel for Thomas A. Leonard, III Esquire and his wife Kathleen, who reside at 2315 Green Street, which is the property immediately abutting the subject property to the west, which has a hearing before the Commission on February 9, 2024. After investigating this matter in the short time allotted, I am aware that the community organization for the area, the Spring Garden Civic Association, has requested a continuance of the February 9, 2024, Commission meeting. Also, the 5th District Councilman, the Honorable Jeffery Young, will be joining in with that continuance request. On behalf of the Leonard's, I wish to also join in with that continuance request, in that I respectfully request sufficient time to prepare for the meeting. As you can imagine, the proposed addition will have a severe adverse impact on light and air of the Leonard's property, which is a historically designated property, and they are clearly aggrieved parties with legal standing to participate in these proceedings. The Leonard's also have a historic garden and open area on their property which will be adversely impacted by the proposal. The Leonard's only recently were informed about this project, on or about late January of 2024. After finding out about the proposal, they have taken immediate action to secure a professional engineer and legal counsel. They first secured their engineer (Plan B), and now have retained me to represent them. Due to the severe impact on the Leonard's property, and the limited time given to prepare for the meeting, we respectfully request additional time to prepare for this case, which will have long lasting effect on the Leonard's property. I hope the Commission would agree that there should be a complete record before making a decision in this case, such that all parties have adequate notice of the proceedings and proper time to prepare.

Pursuant to your Rules and Regulations, Rule 5.16, we agree that the Commission maintains jurisdiction of the property during the pendency of these proceedings, and we agree that permit applications for the property are not subject to the 90-day limit for permit review during the pendency of these proceedings.



Please advise if this request will be granted. Thank you for your consideration of this matter.

Sincerely,

ZARWIN, BAUM, DEVITO, KAPLAN
SCHAER, & TODDY, P.C.

By: /s/ Richard C. Demarco
Richard C. Demarco, Esquire

cc: Office of Councilman Jeffery Young
Spring Garden Civic Association
Allyson Mehley
LO Design

Mr. Robert Thomas, Chairman
and Members of the Commission
Philadelphia Historical Commission
1515 Arch St., 13th Floor
Philadelphia, PA 19102

February 8, 2024

Dear Mr. Thomas: **Re: 2313 Green St., A Photo of 2015 Green That Speaks 1000 Words**



Photo of the 2315 Green St. rear yard showing the effect, on the historic 2315 Green St. property and Period garden, of the proposed 2313 Green St. massive, looming, and incompatible wall, superimposed onto the photo.

Appropriate alternative plans must be explored before the matter can be heard.

Allowing the current project/result would be an affront to owners of the adjacent and nearby historic properties, the District, and the community, and a credibility issue for the Commission.

In 1998-99, as President of Spring Garden CDC, I worked with Mr. Richard Tyler (along with other community residents) for the Spring Garden neighborhood to be designated as a City of Philadelphia Historic District. We were thrilled that, from that date forward, our priceless Victorian architectural heritage, structures, and surroundings were going to be protected from incompatible uses and their adverse effects.

However, the protections afforded by the District are now being tested in the 2313 Green St. matter.

To avoid a disaster for the District, historic property owners, and the community, I would urge the Commission to defer a hearing on the matter until further studies are undertaken as to the potential adverse effects on the District, of the proposed construction and also, to have time to explore the possibility of a more reasonable (and compatible) proposal. The Commission has the authority and - - I would submit - - the duty to do so.

As I understand it, the Commission is required to determine the effects of the new construction not only on the views, from the street, of the new structure and of existing historic properties, but also its effects on the entire surroundings. See the Commission Rule 6(a), p. 38., which provides that the Commission must consider:

... "the compatibility of the proposed work with the character of the historic district or with the character of its site, including the effect of the proposed work on the neighboring structures, the surroundings and the streetscape," and "the design of the proposed work." When reviewing applications for non-contributing buildings, structures, sites, and objects within an historic district, the Commission, its committees, and staff shall place particular emphasis on the compatibility of materials, features, size, scale, proportion, and massing with the historic district."

The views and incompatible massing, height, materials, and design of the structure will mar the streetscape of the District, and significantly adversely affect the historical integrity of the District and the abutting historic properties and surroundings. See the additional attached photos on the views of the proposed new structure from Wallace St and 24th St., included in the Revised Application

Thank you.

Sincerely,



Patricia L. Freeland

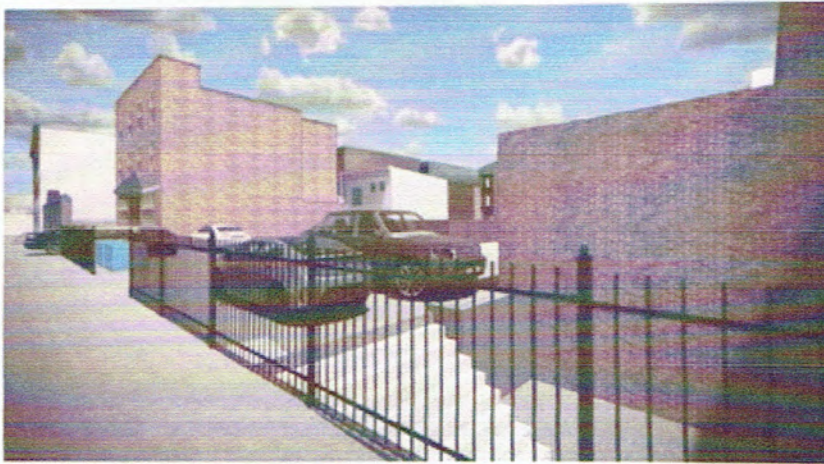
President

215-802-0334



Current Photo from the rear yard of 2315 Green St. and the significant historic fabric and context that would be destroyed by the proposed 2313 Green construction, where a massive tall, incompatible, standing seam metal siding or fiber cement panel wall that would loom over 2315 Green St. and its historic rear garden

VIEW FROM PUBLIC WAY (TREES REMOVED FOR CLARITY)



ADJACENT CONTEXT FROM WALLACE ST

2313 GREEN STREET | SUBMISSION TO THE PHILADELPHIA HISTORICAL COMMISSION | REVISED 09 FEBRUARY 2024

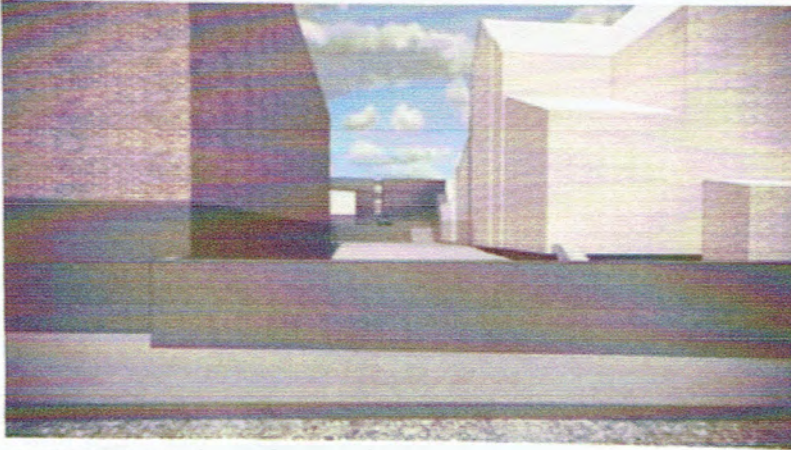


KEY PLAN

LO DESIGN

View of the 2313 Green St. Proposed Massive and Incompatible New Building From Wallace Street

VIEW FROM PUBLIC WAY (TREES REMOVED FOR CLARITY)



ADJACENT CONTEXT FROM 24TH ST



KEY PLAN

2313 GREEN STREET | SUBMISSION TO THE PHILADELPHIA HISTORICAL COMMISSION | REVISED 08 FEBRUARY 2026

LO DESIGN

View of the 2313 Green St. Massive and Incompatible New Building From 24th St.



601 N. 17th St., 1st Fl., Phila PA 19130
215-806-8613; 215-802-0334

Mr. Robert P. Thomas, Chairman
and Members of the Commission
Philadelphia Historical Commission
1515 Arch St., 13th Floor
Philadelphia, PA 19102

February 7, 2024

Dear Mr. Thomas: Re: 2313 Green St., Community Opposition, Multiple Adverse
Effects on the District/Abutting Historic Properties

This letter is being submitted by Spring Garden Civic Association ("SGCA") and Spring Garden Community Development Corporation ("SGCDC") to supplement SGCA's January 11, 2024 letter and attached photos, and to convey our continuing strong opposition to the dense, looming, highly incompatible proposed new construction project at 2313 Green Street. The project will adversely affect the District and abutting historic properties, in multiple ways, as described below and in our earlier letter.

Also, virtually all of the abutting historic property owners oppose the project as detrimental to the District and their historic properties; and they fear damage to their historic homes and other adverse effects from the project. The photos and minimally amended plans included with the revised Application only reinforce the conclusion that this project cannot meet the Secretary of the Interior's Standards for approval.

Further, and significantly, since the date of the last hearing, skilled engineers have been engaged who specialize in projects next to historic structures. After an initial review, they have warned of potential damage, from the proposed 2013 construction activities, to the stability and integrity of the historic structures abutting 2313 Green St. - - including the 2015 Green St. historic carriage house, the historic stable that houses the 2320 Wallace St. Wallace Place Condos, and the adjacent historic brick wall along the property's east perimeter. **Accordingly, we request a further tabling of this Application until the next**

scheduled Commission hearing so that additional engineering reviews/studies can be carried out and additional critical information received.

In addition, since our elected officials were not notified by the Commission of the pendency of this matter, they also need additional time to study the project plans and the project's potential adverse effects on the District, and on community members.

The Applicants' submission of new photographs/sketches in their revised Application clearly show that the project would obscure views of historic properties from the public right of way; would be prominently visible from the abutting streets and historic properties; and that the views of the new structure from the adjacent streets and abutting properties would be highly incompatible with the surrounding historic structures and District. See e.g. the Applicant's photos/sketches, attached hereto, of the views from Wallace Street, with the tall dark foreboding new structure looming in the background, and blocking views of the historic bay window at the rear of the 2313 existing historic Victorian home. Also attached is a photo showing its effect on the 2015 backyard.

In addition, the views of the historic properties from 24th Street and from open space around St. Francis Xavier Church are also compromised by this proposed incompatible new construction; and the tall dark wall looms over, and dominates, the entire historic area.

Further, the Applicants' Wallace St. photos/sketches, below, show both the 2313 Green St. rear garage to be demolished as part of this project, and a new structure to be built abutting the 2015 rear historic carriage house. The engineers have questioned in their initial review whether the 2313 garage can be demolished, and the project excavated and built, without undermining, destabilizing, and potentially even toppling the historic carriage house at 2315. In addition, the historic stable which houses the abutting Wallace Place Condominiums at 2320 Wallace St., and the historic property line wall, are also likely to be at risk if the project proceeds.

Accordingly, more engineering studies/reviews of the site, and project, are needed to better determine all of the likely adverse effects of the project, not only from demolition and excavation, but also from the vibrations from heavy machinery to be used in the proposed construction.

It is well established that, if a proposed project in a Historic District cannot be carried out without adversely affecting the stability and integrity of nearby historic structures and features, it cannot meet the Secretary of the Interior Standards for Commission approval.

Another critical issue is whether it is even possible, or feasible, for heavy machinery to traverse the narrow Wallace Place driveway to access the rear of 2313 - - including the fact that ***the Wallace Place driveway is the sole access for the Wallace Place Condominium residents to enter their units.***

The large, tall proposed new structure cannot be built without obscuring views of historic buildings; incompatibly dominating the streetscape and views from historic properties; disturbing, and potentially destroying, significant historic elements and structures; and creating other adverse effects.

The project fails to meet Standard # 9 of the Secretary of the Interior's Standards for the many reasons - - and as was earlier, and correctly, determined by the Historical Commission's staff - - and as described in our January 11, 2024 letter, and herein.

The Broader Historic Context:

Further - - and we cannot emphasize this issue too strongly - - under additional relevant Standards, the Commission must also look beyond just evaluating the proposed new elevation facing Wallace Court, and other public views, and its resulting incompatibility, and must also consider the historic context of the abutting properties.

Given the critical importance of the issue, and its absence from consideration to date, we are repeating, here, the relevant text from our January 11, 2024 letter.

A significant problem with the project's proposed design ***is its overall size and massing and the impact of that design on 2313 Green Street's historic context***, in addition to its negative impact on adjacent properties on both Wallace and Green Streets.

The 2313 Green Street property and the adjacent historic properties are much more than just facades facing Green Street. The historic relationship between the built structures and their open space environment is integral to their historic significance.

Within the Spring Garden Historic District, the vast majority of the properties constructed in the mid-19th to early 20th centuries were row houses built with small rear yards that backed up to similar properties on the next block. In addition to these rowhouses, there is also a scattering of larger architect designed townhouses which also contained modest yard areas.

However, 2313 and the adjacent 2315 Green St. property are rare and largely unique within the District. They are significant as remaining intact historic parcels consisting of a main house, large garden area, and ancillary carriage house/garage.

Historically, and currently, 2313 Green Street - - as clearly shown in the historic maps and current photos - - consists of the main house facing Green Street and an open rear yard extending north to the one-story garage.

A historic brick wall which delineates a property historically owned by the prominent Philadelphia contractor Rush Whiteside (who resided nearby at 2228 Mt. Vernon Street) defines the eastern boundary and another historic low brick wall runs along the west boundary. A brick walkway extends from the main house to the garage.

To the west of 2313, the property at 2315 Green St. also presents a similar context to 2313, with a large yard with planted Period gardens extending from the main house to a carriage house to the north. See the Application drawings and the attached photos.

During the entire Period of Significance of the Spring Garden Historic District, up to today, this was/is, these properties' historic context. This important relationship between the built structure and its open space should be preserved and must be carefully considered and not discarded by the Commission when evaluating this proposal.

As stated in the National Park Service "Guidelines for Rehabilitating Historic Buildings," to meet the Secretary of the Interior's Standards and in particular Standard #9, it is recommended to ***"Design new construction which is compatible with the historic character of the site and which preserves the historic relationship between a building or buildings, landscape features and open space."*** It is **NOT RECOMMENDED** to ***"Introduce new construction that is visually incompatible or that destroys relationships between buildings, features and open space"***.

Accordingly, the Commission has the responsibility of evaluating the impact of the proposed new construction, on the character of the entire historic property and the adjacent historic properties, not just the built structures.

As proposed, the new construction at 2313 would demolish the existing one-story garage facing Wallace Place; would rise more than 30' in height; and would extend 97'6" south into the previously open yard leaving a mere gap of 18'9" between the historic building and the new construction, destroying any semblance of the historic context of this property.

The new construction would infill the historic open space and destroy the brick walkway landscape feature. It is unclear what would happen with the low brick wall on the western boundary. The large brick wall on the eastern boundary is noted to be retained, but it would appear to be particularly vulnerable and, as noted, would likely not survive intact the construction of a new building at the proposed location.

The size, scale, and massing of the proposed new construction would have a negative impact on the overall properties at 2313 Green Street and the adjacent 2315 and 2317 Green Street. As seen in the submitted West elevation drawings, a 30' blank, dark, equally incompatible, standing seam metal siding or fiber cement panel wall would rise above 2315's open yard, extending above the height of their historic building and looming over it and adjacent properties. See also the attached photos of the historic rear garden of 2315 Green St., which would be significantly adversely affected by the looming new construction.

As clearly shown in the revised Application, the West wall of the 2313 new construction would also be 100% visible from the public right-of-way on Wallace and 24th Streets and

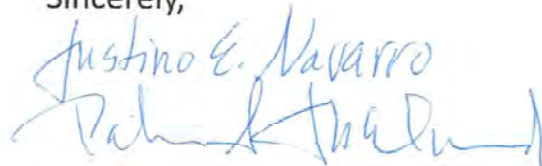
prominently highlights the incompatibility of the proposed structure within the Spring Garden Historic District.

To meet the Secretary of the Interior's Standards - - and in particular Standard #9 - - the "Guidelines for Rehabilitating Historic Buildings" clearly recommends against ***"Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the district or neighborhood."***

Accordingly, we urge the Commission to table the hearing to allow for additional engineering studies, and after a review of the supplemental engineering information to be received, and consideration of the above issues, to vote NO to this proposal.

Thank you.

Sincerely,



Justino E. Navarro
Patricia L. Freeland
Spring Garden Civic Association
Spring Garde Community Devel. Corp.

cc: Mayor Cherelle Parker
Councilmember Jeffery Young, Jr.
Jonathan Farnham
Thomas Leonard, Esq.
Kathleen Leonard

REFERENCES TO ADJACENT CONTEXT



CONTEXTUAL DESIGN REFERENCES

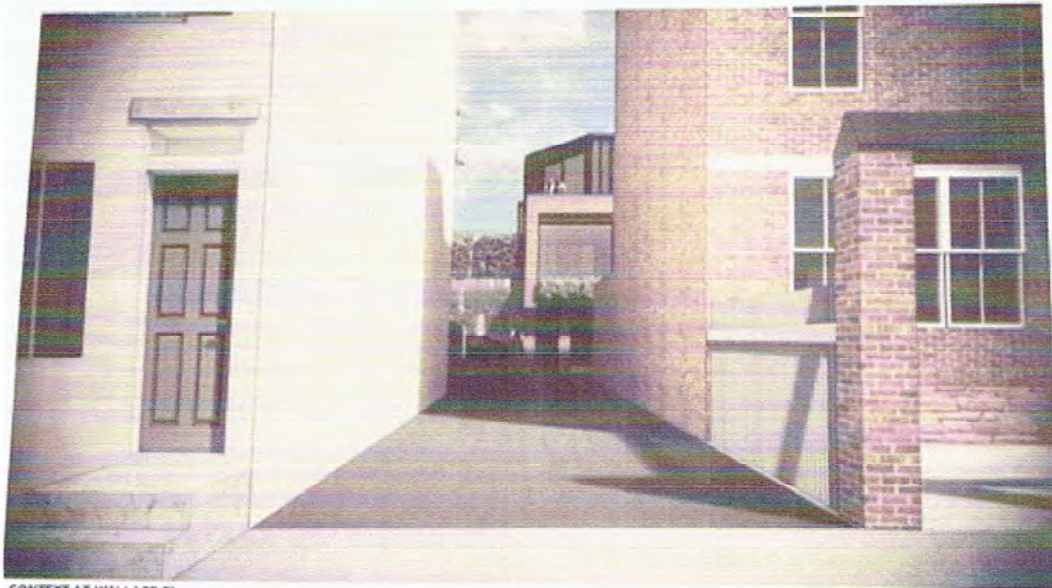
- PROMINENT 2-STORY MASSING
- WINDOW PATTERNING (ONE LARGE, TWO SMALL)
- MIRROR OF DOOR CONFIGURATION @ GRADE
- EXPOSED & PAINTED STEEL HEADERS
- WOOD DOORS OF HISTORIC CARRIAGE HOUSE
- AGED BRICK TEXTURES

GREEN STREET | SUBMISSION TO THE PHILADELPHIA HISTORICAL COMMISSION | 5 DECEMBER 2023

LO DES

View from Wallace St. showing the 2313 Green St. garage to be demolished, next to the 2015 historic carriage house, and the view of the new structure looming over the abutting properties and public right of ways.

VIEW FROM PUBLIC WAY



CONTEXT AT WALLACE PL



KEY PLAN

313 GREEN STREET | SUBMISSION TO THE PHILADELPHIA HISTORICAL COMMISSION | REVISED 09 FEBRUARY 2024

LO DESIGN

View from the 2300 block of Wallace St. and Wallace Place



Photo of the 2015 Green St. Back yard showing the effect, on the historic 2015 Green St. property, of the proposed 2313 Green St. massive, looming, and incompatible wall, superimposed onto the photo.





Photo from the rear yard of 2315 Green St. and the significant historic fabric and context that would be destroyed by the proposed 2313 Green construction, with a massive tall, dark, equally incompatible, standing seam metal siding or fiber cement panel wall that would loom over 2315's historic rear garden.



Additional photo from the rear Yard of 2315 Green St. and abutting historic wall, which would likely not survive the proposed construction.

Development at 2313/15 Green Street

karen fleck <fleckk9@gmail.com>

Fri 2/9/2024 1:32 PM

To: Allyson Mehley <Allyson.Mehley@Phila.gov>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Hello,

Hopefully you are the correct person to lodge a complaint against the proposed development of a new construction which is behind and to the left of my home (other side of driveway.)

My address is 2316 Wallace Street, Phila 19130, a home built in 1870 of which I've lived in since 1989.

The development site is in a cramped location and will impact the integrity of our predominantly 19th century neighborhood. The very narrow driveway is also a walkway which myself and my next door neighbors have direct access to in the rear of our homes, as do the five condominiums in Wallace Court. There is no space for construction trucks etc. on our street as parking, another issue, is very difficult already.

Please consider these points and the pleas of the community, and don't grant permission for this project to move forward.

Sincerely,

Karen Fleck

Sent from my iPhone&

2313 Green St., Demolition and new construction.

Kathleen Leonard <kmleonard67@yahoo.com>

Wed 1/10/2024 1:55 PM

To: preservation <preservation@Phila.gov>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Philadelphia Historical Society
City of Philadelphia, Office of Special Events
1515 Arch St., Philadelphia, PA 19102

I am writing to express my strongest opposition to the demolition and three story construction proposal for the backyard property belonging to 2313 Green Street.

My husband and I are the property owners of 2315 Greet St., a single family home attached to 2313 Green Street. It has been our home for 41 years.

I strongly urge the Commission members to visit the site and to understand firsthand the impact this construction will have on us and the surrounding neighbors before coming to a final decision. The blue prints provided do not genuinely represent the existing surroundings.

The one lane driveway provides egress to the five condominiums in Wallace Place, 2313 Wallace St. garage and 2315 Wallace Street garage. It is unclear to us how construction of a major project will impact this common, rather limited easement.

The 2300 block of Wallace Street is a one way street and is the thoroughway for Saint Francis Xavier schoolyard pick up and drop off, morning and afternoon. What will be the impact on that while construction is ongoing?

Wallace Place neighbors are concerned about the integrity of their hundred year old brick wall that separates them from the 2313 backyard. Our garage is attached to the garage that is cited for demo. It's unclear how that will have an impact on our building.

The project creates more density and does not provide adequate parking, which is always at a premium. Finally, there is absolutely nothing aesthetically pleasing about the structure. It's as though a large helicopter is going to drop a three story commercial container in the backyard, maximizing and overbuilding the site. Other than the front façade being somewhat attractive from Wallace Street, the rest of the structure does not hold up to the standard which the Philadelphia Historic Society strives to preserve.

Kindly give consideration to my suggestion to visit the site. I am eager to give you access to my backyard so you can visualize from all directions how this is going to negatively impact the existing structures and neighbors.

Sincerely,

Mrs. Thomas, A. Leonard (Kathleen M.)
215-680-7794
Sent from my iPhone

Additional construction at 2313 Green St

Maria Belenky <mbelenky2@gmail.com>

Thu 1/11/2024 6:30 PM

To: preservation <preservation@Phila.gov>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Hello,

My husband and I are the owners of unit 3C within the Wallace Place condominiums, at 2320 Wallace St. We have recently been made aware of proposed new construction, to be situated in place of the garage and backyard of the current property at 2313 Green St.

We have a number of concerns about this project.

First and foremost, we are very concerned about the effect of the new construction on the very narrow driveway that leads to all five units of Wallace Place, the garage/residence at 2315 Wallace St., and what would be the new eight unit residence (currently a garage). Note that this driveway is the **only** way in which my family and the other residents of Wallace Place can get into our homes, since Wallace Place sits away from the street. Several of us have small children. If that driveway is blocked for any length of time, either during construction or afterwards due to the increased density, it could mean a significant disruption in our daily lives and ability to get around, as well as a hazard in an emergency situation. Any development plan must ensure that the narrow driveway remains free and clear. I do not see how the current plan guarantees this since the area is so small/narrow and the design is incredibly ambitious.

Moreover, we purchased our home in 2021 in part because of the unique characteristics of the neighborhood, including the >100 year old wall that separates us from the property at 2313 Green St. Any development must maintain the integrity of the existing neighborhood aesthetic and ensure the preservation of existing historic built environment. It is not clear to us how the development adjacent to the wall currently in place can proceed without damaging it (or the carriage house on the other side of the garage that is slated to be demolished). Moreover, the design of the new building is not in keeping with the aesthetic of the current structures. Specifically, the proposed third floor, with its metal siding, would look remarkably out of place.

Finally, we are concerned about the potential quality of life issues that may result from placing a large new building in the space of a small back yard. This is not an empty lot or another building that is being torn down and replaced. The plan requires the construction of a major new multi-family unit in a tiny physical space served by one narrow driveway (see above).

If you have the time, I would invite you to visit the proposed site and look at the immediate area. The renderings in the development plan make the existing space look larger than it is. The renderings, for instance, imagine people sitting out on their front balcony enjoying the evening. What the designs do not show is that these people will be looking at a wall and the driveway.

I am, in general, not opposed to greater density, or even construction at the site of the existing garage. The current development plans, however, are not workable. The proposed building should be

much smaller to reasonably fit the space without impacting quality of life of the existing units and fit the architectural aesthetic of the immediate historic neighborhood. Most of all, the impact on the existing driveway should be negligible. One way to accomplish this would be to make the proposed building design smaller and sit further into the existing backyard. This would allow the area of the existing garage, once demolished, to provide clear additional space for cars to maneuver and for construction materials to sit.

I would again like to invite you to come and see the space for yourself as it is very unique and difficult to conceptualize from the submitted development plan. We'd be happy to give you access to the Wallace Place condominiums.

Best regards,
Maria

Proposed New Construction 2323 Green Street

Laurence Holbert <larryh14@verizon.net>

Fri 1/12/2024 2:19 PM

To: preservation <preservation@Phila.gov>

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Philadelphia Historical Society:

I am contacting you to voice our strong opposition to the proposed new construction at 2313 Green Street. I am the president of Wallace Place Condo Association at 2320 Wallace Street. We have five condos with parking and large courtyard built within the brick walls of a 100+ year old stable with a narrow driveway easement to Wallace Street. The new construction would be 2-3 feet from our eastern side 100 year old brick wall!! I could see our wall collapsing when the start to dig footings. Also construction equipment could never be able to come through the narrow driveway now serving our five condos and garages at 2313 and 2315 Green Street. The proposed five unit apartment building does not belong with all the historical houses on Wallace and Green Streets in the block between 23rd and 24th Streets. The plans shown show a huge eyesore for the historic area. We would certainly not let them use the driveway for construction or parking.

Please DO NOT let this project receive approval.

Laurence Holbert
larryh14@verizon.net



601 N. 17th St., 1st Fl., Phila PA 19130
215-806-8613/215-802-0334

Robert M. Thomas, Chairman
and Members of the Commission
Philadelphia Historical Commission
1515 Arch St., 13th Floor
Philadelphia, PA 19102

January 11, 2023

Dear Mr. Thomas: Re: 2313 Green St. New Construction

Spring Garden Civic Association strongly opposes the proposed project at 2313 Green Street. The project fails to meet Standard # 9 of the Secretary of the Interior's Standards - - as determined by the Historical Commission staff - - and it should not be approved by the Commission.

Further, as described below, a continuance is required here because 1) Applicant has failed to provide photos from which the Commission can plainly see the actual adverse impact of the proposed project, and their Application is therefore deficient; 2) some of the neighbors who would be most affected by the project are not available to attend the Zoom meeting tomorrow; and 3) a site visit to the property and surrounding area would be informative for members of the Commission.

There are numerous reasons why the project and Application fail to meet Standard #9.

First, as noted, the Applicant failed to provide complete information on the visibility and impact of the proposed new construction on the Historic District streetscape. The Application failed to provide sight line studies or renderings of the proposed appearance of the new construction from Wallace Street, and in particular from the south sidewalk of Wallace Street in front of the St. Francis Church parking lot. That

wide open perspective provides an important view that should be fully disclosed so that the construction's impact can be fully evaluated. In addition, the photo presented by the Applicant of the view from Wallace Court does not show how visible in fact the rear of 2313 Green Street is from that location. The historic building's prominent rear bay window is in fact quite visible from the public right-of-way. In the proposed project, that bay window and the entire rear of 2313 Green Street will be blocked by the new construction.

Attached at the end of this letter are 4 photos of the areas noted above.

Second, the Commission needs to look beyond just evaluating the proposed new elevation facing Wallace Court (and its issues of incompatibility).

Rather, another major problem with the project's proposed design is its overall size and massing and the impact of that design on 2313 Green Street's historic context, as well as the negative impact on adjacent properties on both Wallace and Green Street.

The property at 2313 Green Street and the adjacent historic properties are much more than just facades facing Green Street. The historic relationship between the built structures and their open space environment is integral to their historic significance.

Within the Spring Garden Historic District, the vast majority of the properties constructed in the mid-19th to early 20th centuries were row houses built with small rear yards that backed up to similar properties on the next block. In addition to these rowhouses, there is also a scattering of larger architect designed townhouses which also contained modest yard areas. ***However, 2313 and the adjacent 2315 Green Street properties are rare and largely unique within the District. They are significant as remaining intact historic parcels consisting of a main house, large garden area and ancillary carriage house/garage.***

Historically, and currently, 2313 Green Street - - as clearly shown in the historic maps and the existing photos - - consists of the main house facing Green Street and an open rear yard extending north to the one-story garage. A historic brick wall which delineated a property historically owned by the prominent Philadelphia contractor Rush Whiteside (who resided nearby at 2228 Mt. Vernon Street) defines the eastern boundary and another historic low brick wall runs along the west boundary. A brick walkway extends from the main house to the garage.

To the west of 2313, the property at 2315 Green Street also presents a similar context to 2313, with a large yard with planted gardens extending from the main house to a carriage house to the north.

During the entire Period of Significance of the Historic District, up to today, this was/is these properties' historic context. This important relationship between the built structure and its open space should be preserved and must be carefully considered and not discarded by the Commission when evaluating this proposal.

As stated in the National Park Service "Guidelines for Rehabilitating Historic Buildings", to meet the Secretary of the Interior's Standards and in particular Standard #9 it is recommended to ***"Design new construction which is compatible with the historic character of the site and which preserves the historic relationship between a building or buildings, landscape features and open space."*** It is **NOT RECOMMENDED** to ***"Introduce new construction that is visually incompatible or that destroys relationships between buildings, features and open space"***.

Accordingly, the Commission has the responsibility of evaluating the impact of new construction on the character of the entire historic property and adjacent historic properties, not just the built structure.

As proposed, the new construction at 2313 will demolish the existing one-story garage facing Wallace Place; will rise more than 30' in height; and will extend 97'6" south into the previously open yard leaving a mere gap of 18'9" between the historic building and the new construction destroying any semblance of the historic context of this property.

The prominent two-story bay window at the rear of the historic building will also be largely hidden and consumed by the new construction.

The new construction will infill the historic open space and destroy the brick walkway landscape feature. It is unclear what will happen with the low brick wall on the western boundary. The large brick wall on the eastern boundary is noted to be retained, but it would appear to be particularly vulnerable and would likely not survive the construction of a new building at the proposed location.

The size, scale and massing of the proposed new construction would have a negative impact on the overall properties at 2313 Green Street and the adjacent 2315 Green Street. As seen in the submitted West elevation drawing, a 30' blank, dark metal wall will rise above 2315's open yard, extending above the height of their historic building and looming over it and adjacent properties. The West wall would be 100% visible

“Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the district or neighborhood.”

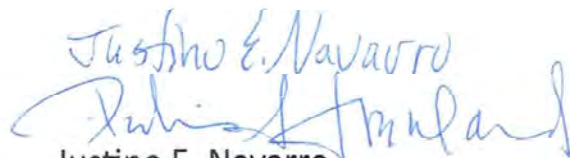
Accordingly, we urge the Commission to vote NO to this proposal.

As noted, we request that the meeting on January 12, 2023 be continued, and that the Applicant prepare a supplemental Application as described above, and that a site visit be planned so that the Commission can better understand the context of the proposed project vis-a-vis the abutting historic structures and open spaces.

Further, no notification of this proposed project was provided to the adjacent neighbors, whose historic properties will be significantly adversely affected and who are strongly opposed to this proposal. A continuance of the January 12 meeting will also give the neighbors who are most directly affected an opportunity to attend the hearing and be heard. For example, the 2315 neighbors are unavailable on the 12th because of a previously scheduled important business commitment and medical appointment.

Thank you.

Sincerely,

Handwritten signatures of Justino E. Navarro and Patricia L. Freeland in blue ink.

Justino E. Navarro

Patricia L. Freeland

Spring Garden Civic Association

cc: Jonathan Farnham
Councilmember Jeffery Young



View of the rear of 2313 Green St. from Wallace Place



Rear view of 2313 Green St. from the 2300 block of Wallace St.



View of rear of 2313 Green St. looking southeast from in front of the St. Francis Church parking lot



2315 and 2313 Green St. rear view from the 2300 block of Wallace Street sidewalk, in front of St. Frances Church Parking lot