

**TO: PHILADELPHIA HISTORICAL COMMISSION**  
**FROM: JON FARNHAM, EXECUTIVE DIRECTOR**  
**DATE: JUNE 7, 2024**  
**RE: ARCHAEOLOGY AND THE WASHINGTON SQUARE WEST HISTORIC DISTRICT NOMINATION**

The Historical Commission will review the nomination for the proposed Washington Square West Historic District at its monthly meeting on June 14, 2024. Constituents have raised questions about the proposed classifications of properties for their archaeological potential. The inventory for the proposed district classifies 21 vacant lots and surface parking lots as contributing resources in the proposed district owing to their archaeological potential. The inventory cites Criterion for Designation I, the archaeological criterion, to justify the proposed classifications. Criterion I stipulates that a property may be designated as historic if it “has yielded, or may be likely to yield, information important in pre-history or history.” In light of objections from several properties owners as well as 5<sup>th</sup> Square, an advocacy group, to the classifications of vacant lots as contributing under Criterion I, the staff of the Historical Commission has reevaluated the nomination and inventory to assess the validity of the objections and to offer recommendations to the Historical Commission. In light of that reassessment, the staff recommends classifying all but two of the 21 sites as non-contributing because the nomination fails to demonstrate that they have yielded or may be likely to yield important information.

Address	Use	Recommended Classification
206 S CAMAC ST	parking lot	NC
203 S JESSUP ST	parking lot	NC
220 S JESSUP ST	vacant lot	NC
230 S JESSUP ST	vacant lot	NC
1102-04 LOCUST ST	parking lot	NC
1114, 1116, and 1118 LOCUST ST	community garden	NC
1235 LOCUST ST	parking lot	NC
1309-15 LOCUST ST	parking lot	NC
1000-42 LOMBARD ST	site of Equity Hall, now Seger Park	C
1123-31 LOMBARD ST	parking lot	NC
1230 and 1232-34 LOMBARD ST	site of church burial ground, now parking lot	NC
1301-13 PINE ST	parking lot	NC
1326 PINE ST	parking lot	NC
1306 RODMAN ST	parking lot	NC
1123-29 and 1131 WAVERLY ST	community garden	NC
205-27 S 12TH ST	site of St. Thomas Church, now parking lot	C
219 S 13TH ST	site of College of Physicians, now parking lot	NC

Table 1: Properties cited as satisfying Criterion for Designation I in the Washington Square West Historic District with current uses and some former uses.

The Statement of Significance in the nomination seeks to justify the classifications under Criterion I with one four-sentence paragraph on page 37, the first three sentences of which are repeated verbatim in the Description section of the nomination on page 19.

[T]he District includes multiple lots that have not seen redevelopment that has entailed extensive subsurface disturbance since the removal of buildings constructed before the twentieth century. Many of these are the site of dwellings or secondary buildings associated with residents of lesser means who would not have left a written record of their lives, and sub-surface remains are likely to yield important information about their lives that cannot be recovered by other means. The District also includes the sites of

institutions associated with the District's Black history. Particularly notable among these are the site of St. Thomas at 203-209 S. 12th Street.

The nomination calls out sites associated with "residents of lesser means" and "the sites of institutions associated with the District's Black history" as having potential archaeological significance.

Of the 21 sites called out in the inventory as having archaeological potential under Criterion I, two, or perhaps three, are sites explicitly associated with Black history in the nomination. The property at 205-27 S. 12<sup>th</sup> Street is noted as being former site of St. Thomas African Episcopal Church. The lot was the third home of the congregation, which built a church on the site in 1889 and left the site for a new location in 1938. The church building was later demolished, and the site is now a surface parking lot. The property at 1000-42 Lombard Street, now Seger Park, is noted as being the "former location of Black residences and Equity Hall." The third, 1121-31 Lombard Street is noted in the inventory as the site "of commercial and residential buildings in the heart of the 7<sup>th</sup> Ward." No other information about the sites is provided.

Of the 21 sites called out in the inventory as having archaeological potential under Criterion I, 14 were sites where one or more rowhouses or other smaller structures were demolished, leaving vacant lots. Presumably, the nomination contends that those sites are associated with "residents of lesser means," but neither the Statement of Significance nor the inventory provides any demographic information about the residents of those lost rowhouses. No basis for their archaeological potential is provided other than notes that the buildings that stood on the sites were demolished. Moreover, other properties, like Louis Kahn Park at 328-38 S. 11<sup>th</sup> Street, are sites upon which buildings once stood but are now open land yet are classified as non-contributing. The nomination provides no basis for concluding that the sites in question were associated with "residents of lesser means" or that they are likely to hold important information.

Two of the 21 sites are plainly not associated with "residents of lesser means" or "Black history," yet proposed for designation under Criterion I. The inventory claims that the surface parking lot at the northeast corner of 13<sup>th</sup> and Locust Streets, comprised of two properties, 219 S. 13<sup>th</sup> Street and 1235 Locust Street, was the former site of the College of Physicians and the Free Library. In fact, the College of Physicians building, which later housed the Free Library for a short time, was located at 219 S. 13<sup>th</sup> Street, but not on the Locust Street property. A rowhouse that was later converted to a nightclub stood at 1235 Locust Street. The nomination provides no basis for archaeological potential at either lot. Moreover, the College of Physicians and the Free Library are well documented by written records; archaeological investigation is not needed to add to our knowledge of these two institutions.

The 21 properties cited in the inventory as having archaeological potential under Criterion I are all vacant lots or surface parking lots without structures. No properties with structures are cited under Criterion I even though numerous properties with structures include significant amounts of open space that are just as likely to contain archaeological resources as entirely vacant lots. For example, the surface parking lots at 1230 and 1232-34 Lombard Street are cited under Criterion I, with the inventory noting that the area was part of the cemetery at the Fourth Presbyterian Church, but the adjacent property at 1212-28 Lombard Street, which includes a building as well as a large section of the same surface parking lot that was also part of the same cemetery, is not cited in the inventory as satisfying Criterion I (Figure 1). The inventory seems designed to classify vacant land as contributing owing to archaeological resources, but not to cite Criterion I for properties that otherwise can be classified as contributing for above-surface resources. In

this regard, the inventory singles out a small handful of properties for archaeological significance but ignores many other sites with the same or greater archaeological potential.



Figure1: The properties at 1230 and 1232-34 Lombard Street (outlined in yellow) are classified as contributing under Criterion for Designation I, the archaeology criterion, but the property at 1212-28 Lombard Street (outlined in red) is not, even though the historic cemetery spanned across all three properties.

As noted in its online posts, 5<sup>th</sup> Square, an advocacy group, opposes the designation of the Washington Square West and Spruce Hill Southeast Quadrant historic districts for various reasons including reasons predicated on the classification of vacant lots and parking lots as contributing under Criterion I. For example, see: [https://www.5thsg.org/wash-west-historic-district?utm\\_campaign=newsletter\\_282&utm\\_medium=email&utm\\_source=5thsg](https://www.5thsg.org/wash-west-historic-district?utm_campaign=newsletter_282&utm_medium=email&utm_source=5thsg) In its opposition to the Washington Square West Historic District, 5<sup>th</sup> Square erroneously claims that “‘historic’ parking lots (denoted as ‘contributing properties’) ... would be ‘preserved’ under this proposal,” and thereby “raise rents and home prices by restricting the supply of new housing.” Of course, the inclusion of these vacant lots and parking lots as contributing resources owing to their archaeological potential would not prevent their redevelopment for housing or other purposes. Of course, the Historical Commission would not seek to preserve parking lots as “historic” parking lots. If designated as proposed, the Historical Commission would require archaeological investigations of the lots before redevelopment. Such investigations would first ascertain if archaeological resources were extant at the site, and then if they were, either find ways to build without disturbing the resources or to recover the data from those resources before they were destroyed by the construction. Most archaeological investigations do not involve data recovery, but either find that resources are not extant or can be avoided. But, even if resources exist and cannot be avoided by construction, the data in the resources can be extracted and then the site redeveloped in compliance with preservation standards. The designation of this district as proposed would not preserve “historic” parking lots or prevent the redevelopment of open land in the district, as 5<sup>th</sup> Square incorrectly claims.

In summary, the staff recommends that the Historical Commission classify two of the 21 sites as contributing under Criterion I (1000-42 Lombard Street and 205-27 S. 12<sup>th</sup> Street) and classify the remaining 19 sites as non-contributing. The nomination documents that the properties at 1000-42 Lombard Street and 205-27 S. 12<sup>th</sup> Street were the sites of two buildings significant in Black history, Equity Hall and St. Thomas African Episcopal Church, respectively. Sufficient evidence is included in the nomination to demonstrate that those two sites qualify for designation under Criterion I. The nomination fails to fully or clearly document that any other Criterion I sites were associated with Black history. Likewise, the nomination claims but fails to document that any of the Criterion I sites were associated with “residents of lesser means.” No demographic or other information is presented in the nomination to show that the sites in question were occupied by “residents of lesser means,” or that the sites have yielded, or may be likely to yield, information important in the histories of such people. The claim is made without any evidence. Also, the sites at 219 S. 13<sup>th</sup> Street and 1235 Locust Street should be classified as non-contributing. The site at 1235 Locust Street was not associated with the College of Physicians, as the nomination wrongly claims; a rowhouse stood on the site. The site at 219 S. 13<sup>th</sup> Street was associated with the College of Physicians, but that institution was unrelated to the histories of the Black community or “residents of lesser means,” the purported bases for Criterion I. Additionally, the histories of the College of Physicians and the Free Library, which occupied the site briefly, are well documented and not dependent on archaeological investigation to fill lacunae in our knowledge of them. Also, the sites 1230 and 1232-34 Lombard Street should be classified as non-contributing. Currently, there is no basis in the Statement of Significance to justify the classification of the properties as contributing, because the Fourth Presbyterian Church and its burial ground are unrelated to the histories of the Black community and “residents of lesser means.” However, the staff recommends that, if the district is designated, the Historical Commission direct the staff to prepare an amendment to the nomination proposing to reclassify the properties at 1212-28, 1230, and 1232-34 Lombard Street as contributing under Criterion I, owing to the former cemetery of the Fourth Presbyterian Church. It is likely that human remains survive at the site, even if there was an effort to disinter and reinter remains when the cemetery closed. Given that the site was a cemetery, it warrants designation under Criterion I, provided the requisite information is provided to justify the designation.

The staff makes these recommendations on narrow, technical grounds. The staff does not claim that the sites do not have archaeological potential, but only that the nomination fails to demonstrate the likelihood of archaeological artifacts containing important information. The Historical Commission has an affirmative obligation to demonstrate to the property owners with the nomination that the sites have yielded or may be likely to yield important information before designating under Criterion I. The nomination’s discussion of Criterion I and the supporting inventory information lack the requisite level of specificity. Moreover, any designation under Criterion I without supporting evidence in the nomination could place the entire district at risk on appeal. However, the nomination could, of course, be expanded later to provide the missing information, and the district then amended to apply Criterion I to the applicable sites.