

**OWNER SUBMISSION FOR
4024-34 APALOGEN ROAD**

COMMONWEALTH OF PENNSYLVANIA)
) ss.
COUNTY OF PHILADELPHIA)

I. PROPERTY DETAILS AND BACKGROUND OF CURRENT OWNERS

6. Seeking to be closer to William Penn Charter School, where their young daughter attends school, Owners purchased the Property in June 2024 with the intention to take down the existing house and build a new house for use as their family residence. For health-related reasons, Owners' require, and sought to build, a home with a primary bedroom, bathroom, and home office on the ground level, with minimal steps needed to enter the home.

II. OWNERS EFFORT AND INVESTMENT IN THE PROPERTY

7. In July 2024, Owners met VARENHORST for an on-site interview, The owners had the site surveyed and then signed a letter of agreement dated September 9th 2024 to engage VARENHORST Architects (the “Architect”) to design a new residence for the Property (the “Project”). The Project necessitated the demolition of the Building.

8. At the recommendation of the Architect, Owners contacted Freeman’s-Hindman Auctions to assist with the repurpose of certain furniture elements within the Building, including a Wharton Esherick designed fireplace, a decorative Paul Evans wall-mounted cabinet, and a Phillip Lloyd Powell wall-mounted credenza. Owners’ signed a contract with Freeman’s-Hindman on September 9, 2024; all three pieces have since been sold.

9. As detailed fully in Exhibit D, between July 2024 and October 2025, Owners engaged an interior design firm, an architect, civil engineers, landscape architect, septic contractor, kitchen designer, structural engineer, geotechnical engineer, MEP engineer, general contractor, and an environmental testing agency for the required surveys, testing, and materials needed to fulfill the following milestones and deliverables, as required by the City of Philadelphia:

- (a) Site Survey (completed August 2024)
- (b) Schematic Design (completed February 2025)
- (c) Septic Design and Soils Testing (completed March/April 2025)
- (d) Landscape Plans (completed March 2025)
- (e) Conceptual Stormwater Management Plans (submitted to the Philadelphia Water Department (“PWD”) in April 2025)¹
- (f) Septic Design (submitted to the City of Philadelphia Department of Health in June 2025)
- (g) Performance of Standard Penetration Test (completed July 2025)
- (h) Final Design (completed July 2025)
- (i) Issuance of Septic Design Permit from City of Philadelphia Department of Health (July 2025)
- (j) Act 537 Exemption Application (submitted to PWD July 2025 and approved September 2025)

¹ Conceptual Stormwater Management Approval from PWD is a pre-requisite approval for a zoning permit for any project disturbing more than 5,000 sq. ft. of land area.

- (k) Geotechnical Report (completed July 2025)
- (l) Arborist Report (completed August 2025)²
- (m) Environmental Report (completed September 2025)
- (n) Streets Department Pre-Zoning Approval (issued by the Streets Department September 2025)³
- (m) Zoning Plans (completed October 2025)
- (n) Building Plans (completed October 2025)

10. Between June 2024 and September 2025, Owners spent more than **Four Hundred Thirty-Six Thousand Dollars (\$436,000)** for the studies, consultants, and designs described in Exhibit D and summarized in Section 2 above. These costs and efforts were undertaken *prior* to any historic nomination of the Property.

III. NOMINATION OF THE PROPERTY AND ILLEGAL TRESPASS

11. On September 8, 2025, Amy Lamber and Steven Peitzman of the East Falls Historical Society (the “Nominator”) submitted a “Nomination of a Historic Building to the Philadelphia Register of Historic Places” for the Property (the “Nomination”). The Nomination was thereafter accepted by the Philadelphia Historical Commission only three (3) days later on September 11, 2025.

12. At the time Owners received notice of the Nomination from the Philadelphia Historical Commission in mid-September, the Zoning Plans and Buildings Plans for the Project were more than 95% complete with Architect (on behalf of Owner) preparing to submit to the Department of Licenses and Inspections for a zoning permit and building permit for the Project by early October 2025.

13. All of the Building-specific images, included in Figures 7 through 29 of the Nomination were clearly obtained by illegal trespass onto the Property, which trespass occurred on August 29, 2025 (The “Illegally Obtained Photos”). A site plan depicting the locations from which the Illegally Obtained Photos were taken is included in Exhibit E.

14. Additionally, the Illegally Obtained Photos include several images that were obtained by trespassing within the boundary of Building, including both on top of and beneath the Building’s attached deck (Figures 14, 15, and 16) and within a fenced area behind the Building, which can only be accessed through the fence gate (Figures 17, 18, 19, and 20).

² The Arborist Report recommended the removal of eighteen (18) trees due to such trees being dead, damaged, diseased, or posing a danger to life or property. The Arborist Report and supporting photos are included in Exhibit F.

³ Streets Department review and approval is a required prerequisite for a zoning submission for new construction with a driveway.

15. Nominator never sought permission from Owners to access the Property and Building for any purpose and never contacted or notified Owners regarding their intent to submit the Nomination.

IX. CONCLUSION

16. Owners, who have made improving Philadelphia their life's work, purchased the Property to make their family home. Owners spent more than one year and more than \$436,000 dollars to advance the Project, following all of the required steps to obtain the necessary City of Philadelphia permits and approvals. Within weeks of filing applications for the Project's zoning and building permits, an unknown party illegally trespassed onto their Property to take unauthorized photos of the Building, which were then used by the Nominator in an attempt to thwart Owner's plans. To designate the Property at this time would only reward the illegal actions underlying the Nomination and punish the Owners, who, in good faith, invested significant time, effort, and money securing the approvals required by the City of Philadelphia in furtherance of the Project.

Further, your deponent saith not.

eSigned by Black Knight EXP-DocVerify: 2025-10-10 10:13:58 EDT
Valerie Safran
6334050:37989316:41244108

Valerie Safran
Owner of 4024-34 Apalogen Road

eSigned by Black Knight EXP-DocVerify: 2025-10-10 10:14:37 EDT
Marcie Turney
6334050:37989316:41244109

Marcie Turney
Owner of 4024-34 Apalogen Road

Sworn to and subscribed before
me this 10th day of October
2025

eSigned by Black Knight EXP-DocVerify: 2025-10-10 10:14:54 EDT
Lisa Whiteley
6334050:37989316:41244110

Notary Public

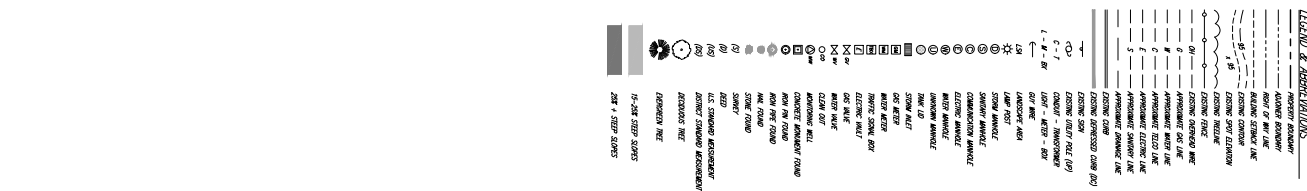
Commonwealth of Pennsylvania - Notary Seal
LISA WHITELEY, Notary Public
Philadelphia County
My commission expires Nov 15, 2027
Commission number 1178196

Notarial Act Performed by Audio visual communication

EXHIBIT A

Property Description

(attached)



GRAPHIC SCALE

(IN FEET)

1 inch = 50 ft.

REVISIONS

NO.	DATE	DESCRIPTION
1	01/11/11	ISSUED FOR PERMIT
2	01/11/11	ISSUED FOR PERMIT
3	01/11/11	ISSUED FOR PERMIT
4	01/11/11	ISSUED FOR PERMIT
5	01/11/11	ISSUED FOR PERMIT
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100	01/11/11	ISSUED FOR PERMIT

PROJECT LOCATION

4012-34 HAVESON ROAD
CITY OF PHILADELPHIA
PHILADELPHIA, PA 19129

BOUNDARY LOCATION AND TOPOGRAPHIC SURVEY

STEVEN J. ROMICH
PHILADELPHIA, PA 19129

TITLE

BOUNDARY LOCATION AND TOPOGRAPHIC SURVEY

DATE

01/11/11

PROJECT LOCATION

4012-34 HAVESON ROAD
CITY OF PHILADELPHIA
PHILADELPHIA, PA 19129

DATE

01/11/11

TITLE

BOUNDARY LOCATION AND TOPOGRAPHIC SURVEY

DATE

01/11/11

Cornerstone

Consulting Engineers & Design Services, Inc.

213 W. Main Street, Suite 200 - Lansdale, PA 19446

Phone: 610-820-8200 - Fax: 610-820-3706

WWW.CORNERSTONEINC.COM

Dallas, TX
Leesburg, VA
Orlando, FL
Philadelphia, PA

EXHIBIT B

View from Public Right of Way on Apalogen Road



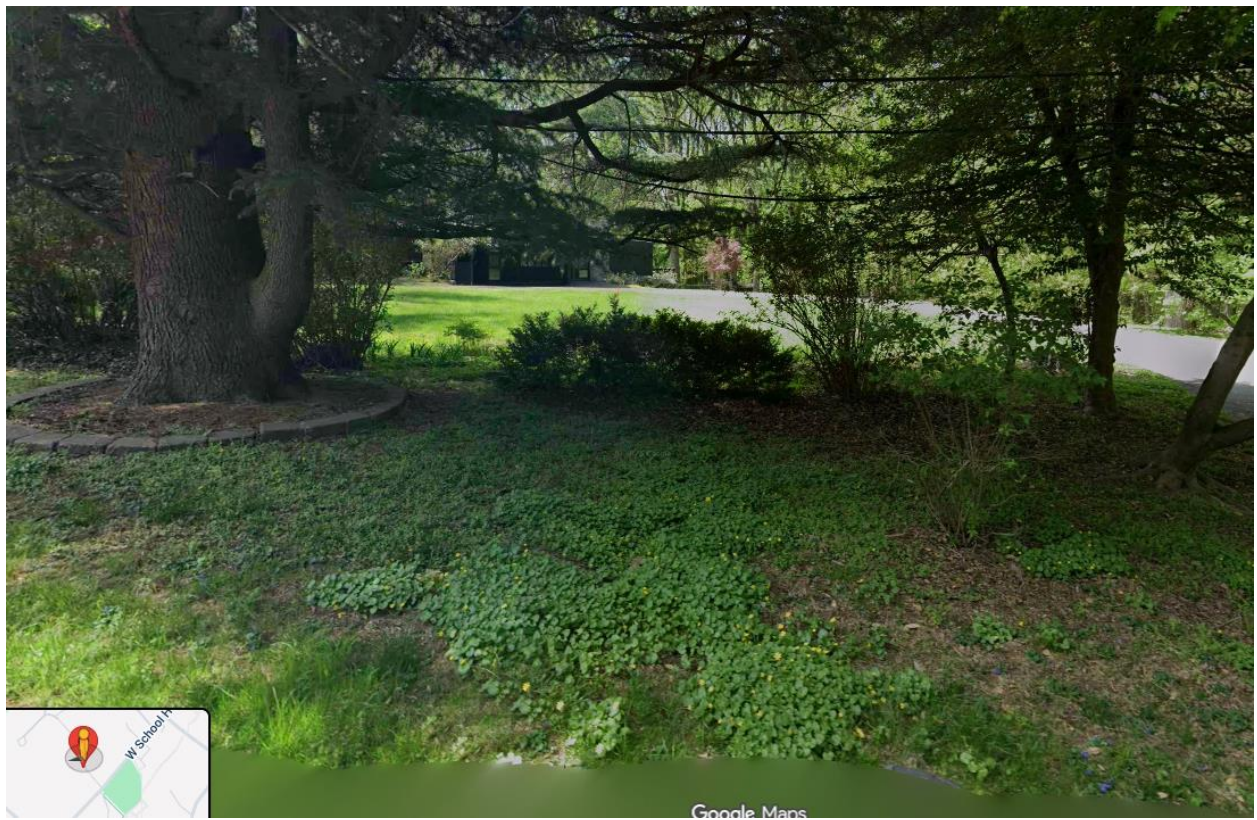




EXHIBIT C

Building Exterior: Before and After Exterior Changes



BEFORE

Source: East Falls Historical Society (Date: Unknown)



AFTER

Source: Zillow Listing (Date: 2025)

EXHIBIT D

Project Timeline

(attached)

SITE PLANNING & DESIGN	14-Jun-2024	Property Purchased
		Owners engaged Interior Designer
		Owners engaged Architect

9-Jul-2024	Owners engaged VARENHORST recommended Civil Engineers for site survey
24-Jul-2024	Survey Field Work
12-Aug-2024	Architects contacted City Planning to confirm impervious coverage requirements in W
13-Aug-2024	Site Survey Completed
13-Aug-2024	Owners engaged VARENHORST recommended Civil Engineers to provide site engineer
17-Sep-2024	Owners engaged VARENHORST recommended Landscape Architects
27-Sep-2024	Architects contacted Septic Contractor to discuss site requirements for septic system
Oct-2024 – Nov-2024	Conceptual design
Nov-2024 – Feb-2025	Schematic Design
27-Feb-2025	Owners engaged Kitchen Designer

DESIGN DEVELOPMENT	Mar-2025	Architectural & Landscape Design approved by owners
	11-Mar-2025	Owners engaged Septic Contractor to prepare Septic Design in accordance with City of Philadelphia
	9-Apr-2025	Surveyor staked property in preparation for required septic soils testing
	9-Apr-2025	Architects engaged MEP Engineer
	10-Apr-2025	Architects engaged Structural Engineer
	18-Apr-2025	Owners engaged Geotechnical Engineer to prepare geotechnical report and infiltration testing required for PWD
	24-Apr-2025	Drawings sent to Contractors for pricing
	28-Apr-2025	Civil Engineer submitted Conceptual Stormwater Management plans for PWD ERSa Zoning permit pre-requisite requirement
	13-May-2025	Septic contractor engaged Soil Scientist, as required by City of Philadelphia, to perform soil testing for septic design
	13-May-2025	Comments received from PWD review. Act 537 Sewer Exemption was requested. Septic Design needed to get approved before Act 537 issuance
	10-Jun-2025	Geotechnical Engineers performed test pits and infiltration testing
	20-Jun-2025	Septic design submitted to City of Philadelphia
	20-Jun-2025	Owners meet to interview Contractors
	1-Jul-2025	Geotechnical Engineers performed Standard Penetration Test drilling and borings

CONSTRUCTION DOCUMENTS	Jul-2025	Architects finalized design development and moved into construction documents
	8-Jul-2025	Septic Design Permit issued by City Health Department
	24-Jul-2025	Civil Engineer submitted application for Act 537 exemption to the PWD Sewage Enforcement Officer
	28-Jul-2025	Geotechnical report and foundation recommendations completed
	29-Aug-2025	Wharton Esherick fireplace removed to be preserved
	8-Sep-2025	PWD Sewage Enforcement Officer confirmed that the project was granted an exemption from the planning requirements pursuant to Act 537
	15-Sep-2025	Contractor received bids for demolition
	15-Sep-2025	Contractor engaged environmental testing agency for environmental report. Asbestos was detected.
	17-Sep-2025	Civil Engineer submitted plan and application to Streets Department
	23-Sep-2025	Streets Department Approval Received
PERMIT SET		

Architectural	1-Oct-2025	Civil engineering drawings ready to submit for Zoning Permit
Structural	1-Oct-2025	Architectural and engineering drawings ready to submit for Building Permit

EXHIBIT E

Locations of Illegal Trespass

(attached)





Locked gate to deck.



Locked gate to garden.

Exhibit F

Arborist Report and Photos

(attached)



McFARLAND-SHECHTMAN TREE AND LANDSCAPING

255 W Tulpehocken St.
Philadelphia, PA 19144

215-776-TREE

www.shektree.com



August 14, 2025

Marci Turney & Valerie Safran
4030 Apalogen Road
Philadelphia, PA 19129

C/O: RAS Landscape Architects, INC.
c/o Andrew Calderone & Allan Summers
28 W State Street
Media, PA 19063

302-888-1544

acalderone@raslainc.com

asummers@raslainc.com

ISA CERTIFIED ARBORIST: AARON COLEMAN PD-2744A

RECOMMENDATIONS FOR TREE REMOVALS

- Locust at left side of house
 - Tree is in danger of falling over house and site of future construction
 - Removal recommendation due to:
 - Poor branching structure
 - Lack of care over the years.
 - Due to the root system sitting at a retaining wall, it does not have the proper area to support the size of the tree.
- Honey Locust at left side of house, closer to rear, in severe decline
 - Removal recommendations due to:
 - Lack of care over the years.
 - Large, dangerous dead wood.
 - Pruning would not support the health of the tree.
 - Fungal growth at tree's base.
- Poplars (2) at left rear corner, crest of bank
 - Removal recommendations due to:
 - Severe lean toward house.
 - One Poplar is slightly coming out of the ground.
 - Weight stress.
 - Pruning these trees to alleviate the weight stress would adversely affect the overall health of both trees, leading to eventual removal anyway.
- Small Maples (2) directly behind house
 - Removal recommendations due to:
 - First Maple is dead.
 - Second Maple has severe dead wood and gall growth on tree.
- Poplar to the right of house
 - Removal recommendation due to:
 - Severe wound approximately 15' up to main union of tree.
 - Severe dead wood.
- Large Poplar to the right of house
 - Removal recommendation due to:
 - Root flare at back side of tree is not nearly as prevalent as in the front. Tree is not anchored as it should be.

- Severe dead wood, weight stress, and top weight. Pruning this tree to resolve its issues would adversely affect overall health.
 - Black Walnut to the right of above Poplar, in severe decline
 - Removal recommendation due to:
 - Weight stress, tree is also leaning toward house. Pruning this tree to resolve its issues would adversely affect overall health.
 - White Pine in front of property
 - Removal recommendation due to:
 - Abnormal growth on trunk near power lines.
 - Will cause eventual issues with power.
 - Smaller Maple tree next to Pine, near driveway, in decline
 - Removal recommendation due to:
 - Abnormal growth at base
 - Poor overall health likely due to overexposure to road salt.
 - Poplar tree at far right of house
 - Removal recommendation due to:
 - Beginning to lift from ground
 - Long standing wound at backside of tree, near union meet point.
 - Pines (3), Holly (1), and Hemlock (1) along front
 - Removal recommendations due to:
 - Trees were originally planted incorrectly and are growing into power lines.
 - Continual maintenance will eventually cause abnormal growth patterns and overall health decline.
 - Double-leader 36" Box Elder at north side of property, north of shed toward property line
 - Remove recommendation due to:
 - Poor overall health, considerable dead branches and scaring.
-

TOTAL: \$58,500.00



Tulipwood Poplar Tree on Property



Pine Tree at Property



Black Walnut Tree at Property