

2027 and 2029 Brandywine St.

Public Comment

March 24, 2026

Dr. Jon Farnham
Ms. Heather Hendrickson
Philadelphia Historical Commission
1515 Arch Street, 13th Floor
Philadelphia, PA 19102

Re: 2027-2029 Brandywine Street

Dear Jon and Heather:

I had a chance to listen in to the Architectural Committee review of the proposed project at 2027-2029 Brandywine Street this morning. I did not make a comment, as I was not sure enough of my facts, but I've done a little research since the meeting, and wanted to offer some thoughts.

While I understand that the Commission's review is limited to the things which affect historic fabric, and not the overall building code, there is an important crossover in this case. As I interpret the city's guidelines for demolition (attached), when more than two-thirds (2/3) of a building's structural framing members, and exterior envelope, are being removed, that is considered a complete demolition, with all of the attendant contractor and public notification requirements. It was hard to tell from the plans submitted, but in looking at the plans and hearing the discussion, it seems very possible that more than 2/3 of this combined structure is being removed. If that is the case, then what the Commission should be reviewing at its full meeting is a request for complete demolition. I'm assuming that's not what the owners, nor their architect, is intending, but that may be how it is interpreted by L & I.

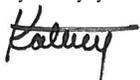
If L & I determines that more than 2/3 of the structure is being removed, then this project would come back to the Commission to be evaluated as a full demolition request, and should that happen, I don't see that this project meets any of the requirements for full demolition – there's no financial hardship; this is not in the public interest; and clearly both of these buildings could continue to be used as residences, and could be individually sold as such. That's a scenario that the owners would likely wish to avoid.

In my practice, I've encountered this issue once or twice – not with projects of this nature, but with the stabilization of severely deteriorated buildings. We were careful in those cases to supplement existing framing, rather than removing it, in order to avoid the declaration of demolition. It seems that some sort of approach could be crafted for these buildings that would not result in the extreme demolition currently planned.

I'll also add, as long as I am writing, that I join the committee in their opposition of the pitched roof proposed for this project. That could set a precedent that we would all come to regret.

Please forward this letter to the members of the Architectural Committee, and feel free to forward it to the owners and their architect, if that is appropriate.

Very truly yours,



Katherine Dowdell, AIA

Cc: Members of the Architectural Committee

Plan Requirements:

Complete demolition permit applications

Overview

The Department of Licenses and Inspections (L&I) reviews plans submitted with permit applications for complete demolition of buildings and structures. Review the information below before submitting plans for review.

Plan sheet size and material

- Minimum Sheet Size: 18 in. x 24 in.
- Maximum Sheet Size: 36 in. x 48 in.
- Print plans on white, standard-weight, bond type paper and provide 3 hard copies with the application.
 - For additional details on filing a paper permit application, refer to the [Paper Processing Information Sheet](#).
 - For plans that will be submitted in eCLIPSE, refer to the [ePlan Submission Standard information sheet](#) for rules and limitations of creating drawing files that will be uploaded for review.

Acceptable drawing scales

- Architectural Scale: 1/16 in.; 3/32 in.; 1/8 in.; 3/16 in.; 1/4 in. = 1 ft. 0 in.
- Engineering Scale: 1 in. = 10 ft.; 20 ft.; 30 ft.; 40ft.; 50 ft.; 60 ft.; 100 ft.

Minimum requirements

- Must be of professional quality and drawn to scale. Free-hand sketches will not be accepted.
- Printed plans must be in ink and in grayscale. Pencil drawings will not be accepted.
- Project address and title block with sheet number.
- Depict location and means of protection for pedestrians, public right-of-way, and adjacent structures.
- A fully dimensioned site plan which includes elements listed below with the distance between each element and the structures to be demolished:
 - All property lines.
 - Widths and locations of adjacent walkways, streets, and easements including private driveways or other paths used by pedestrians. This includes railways and public space along watercourses.
 - Height, number of stories, construction type and structural condition of:
 - Buildings being demolished
 - Any neighboring buildings or structures
 - The extent of demolition, including underground removals. If a partial demolition, highlight sections to remain.
 - Utilities, trees, light poles, street furniture, and any items over 8 ft. in height potentially impacted by demolition activity.
- Description of the method of demolition to be applied. If method varies for different portions of building, highlight scheduled approach to removal at each affected area.
- Details on potential hazards (i.e., collapse, structural failure, etc.).
- Highlight of any other safety exposures and environmental issues.

Notes:

- **The removal of two-thirds or more of building structural framing members, coupled with the modification of the exterior envelope, shall constitute complete demolition.**
- **The site plan, site safety plan, and pre-construction assessment may be consolidated on a single plan or presented through separate documents.**

Design professional signature and seal

The signature and seal of a Pa-Licensed design professional must seal the site safety plan and pre-construction assessment under the following conditions:

- For the complete demolition of a building in excess of three stories or any structure in excess of 40 feet in height.
- Where the use of mechanical demolition is recommended in writing by a licensed structural engineer, pursuant to Section B-3309.
- Where mechanical demolition equipment, other than handheld devices, is to be used in the full or partial demolition of a building within the building and with the mechanical equipment being supported by the building or is to be used within the building to remove debris or move material.

Prerequisite approvals

Plans included with your demolition permit application package may require approvals from other departments or agencies, to include the following agencies:

- Philadelphia Water Department:
 - To discontinue water service
 - For earth disturbance of 5,000 sq. ft. or more
- Philadelphia Department of Public Health – for dust control where building is over three stories, over 40 feet in height or exceeds 10,000 sq. ft. footprint.
- Department of Streets – to close off any portion of the sidewalk or street
- Historical Commission – for historical properties