



PRESERVATION ALLIANCE

for greater philadelphia

December 4, 2025

Philadelphia City Planning Commission
1515 Arch Street
Philadelphia, PA 19102

Dear Members of the Planning Commission,

On behalf of the Preservation Alliance for Greater Philadelphia, I appreciate the opportunity to comment on Bill No. 251030, which we believe will significantly weaken the city's historic preservation ordinance. We acknowledge the importance of maintaining a clear and effective preservation ordinance, one that aligns with the City's broader planning goals and reflects the long-standing public interest in safeguarding Philadelphia's historic resources. For decades, the Historic Preservation Ordinance has expressed a fundamental policy commitment: that protecting historic buildings, landscapes, and neighborhoods is a matter of public good for the citizens of Philadelphia.

While we appreciate Councilmember Squilla's willingness to engage with stakeholders, the bill, as introduced, poses serious concerns that warrant deeper review. The changes proposed are not technical adjustments. They fundamentally alter how properties are protected and how the public participates in the designation process.

Several provisions would create inequitable and risky outcomes. For example:

- The bill introduces a new pre-hearing requirement that delays designation jurisdiction. This means that simply filing a nomination, something meant to safeguard a building, could instead serve as a warning signal to an owner to rush through demolition before the Historical Commission can act. In practice, this could allow demolition or irreversible alterations before any meaningful evaluation of historic significance occurs.
- The bill allows pending zoning applications, often not public knowledge, to block designation altogether. This shifts the balance toward private development interests and away from transparent public review.
- By removing landscape architects and designers from Criterion E and heightening the burden on archaeological significance in Criterion I, the bill weakens the City's ability to recognize and protect landscapes that are central to community character.
- The bill removes language allowing the Commission to evaluate the impact of proposed work on the surrounding context, eliminating an essential preservation standard and weakens design review

These are structural changes with real consequences that could create inequitable processes, shift the balance toward private development interests, and jeopardize

potentially significant historic buildings before they receive even basic procedural review by the Historical Commission.

We believe it may be possible for these issues to be resolved, but it will require more time and a more inclusive process. Preservation professionals, neighborhood advocates, civic groups, developers, and City staff all have important perspectives to contribute. A collaborative approach will produce a clearer, more functional ordinance that serves both preservation goals and broader planning priorities.

For these reasons, we respectfully request that the Planning Commission delay action on the bill. A brief hold will allow continued conversations among Councilmember Squilla's office, the Department of Planning and Development, the Historical Commission, and the wider preservation community. With additional input and refinement, this legislation could move forward in a way that strengthens, not diminishes, Philadelphia's preservation framework.

Thank you for your consideration and for your continued stewardship of the city's planning and preservation values,

A handwritten signature in black ink, appearing to read "Paul Steinke". The signature is fluid and cursive, with a prominent loop at the end.

Paul Steinke
Executive Director