

SEPTEMBER 2026

The Preservation Tax

\$1,450 a year

on the average home

WASHINGTON SQUARE WEST HISTORIC DISTRICT CASE STUDY



WHAT DESIGNATION COSTS

\$1,450

more a year, on average, to keep up the same house in the newly designated Washington Square West Historic District, and when a roof or windows need replacing, the bill arrives all at once.

Nothing about the buildings changed. What changed is that the Historical Commission added the whole neighborhood to the historic register at once. Designation means the City must approve work on your house, sets the materials, and charges permit fees on work that used to need no permit.*

+47%

more permits for the same upkeep, because routine repairs that needed no permit before now need one. Already-designated neighbors pulled 14% fewer

+17%

on top of the property tax bill of the median newly designated house, with no vote of City Council

\$0

from the Preservation Alliance and the City, which created the district, toward what it costs owners to keep up their homes. They stop caring when the bills arrive for their decisions

3 words

is all the nomination offers, at the median, to explain why a newly designated property belongs in the district. Half get no explanation at all

"My family chose our house after confirming it wasn't historically designated. There's nothing historic about my house. It was built in the 70s. Yet we were designated despite our objections. It's resulted in an extra \$4k to fix our roof because our preferred contractor refused the job when he found out he'd need to deal with the historic commission."

Owner of a house built in the 1970s

"I had to forgo a replacement window job because the expense was outrageous given the requirements for new windows. I am 82 yrs. old and am like other senior citizens on a fixed income."

Homeowner of 48 years

* Measured against 719 already designated properties in the district whose rules did not change, over the 29 months after the Historical Commission took jurisdiction.

SUMMARY

A preservation tax, paid by the people who did not ask for it, on buildings the nomination barely explains, with relief that reaches developers and not homeowners

Mayor Parker has said that "beyond public safety, there is no more pressing issue for Philadelphia than access to housing." Her two-billion-dollar H.O.M.E. plan promises to preserve 16,500 existing homes and spends \$34.7 million a year repairing the homes of owners who cannot afford to. At the same time the City's Historical Commission is adding neighborhoods to the historic register a thousand properties at a time, and every one of those homes comes under rules that make it more expensive to keep. This report measures how much more it costs to maintain a home that is subject to designation, **\$1,450 a year, for every newly designated property, on average.**

The Washington Square West case

On 21 March 2024 the Commission notified every owner in Washington Square West that their buildings were proposed for designation. From that day it controlled their permits. Roughly half of those buildings had already been individually designated years before, so their rules did not change. The other 618 got new rules. The two groups sit on the same blocks, a typical pair about fifty feet apart, with the same market, the same contractors, the same weather. That is as close to a controlled experiment as housing policy ever gets.

Since designation, the newly designated group pulled 47% more permits, because routine maintenance that needed no permit before designation now does. Approvals took eleven days longer. The permit record shows the average newly designated property now spending \$1,450 a year more on its upkeep than it would have, because that upkeep now runs through the Commission. That is the preservation tax: additional costs and hassle to own a home on a block the Commission chose to designate, all paid for by people who were not asked if they wanted to be designated and who receive no help or benefit from the designation.

The \$1,450 does not arrive as a regular annual bill that can be planned around. It hits in lumps of thousands or tens of thousands of dollars, when an owner suddenly learns that the house needs historic wood windows, or a custom replica door, or that the preferred contractor will not take the job because he does not want to deal with the Historical Commission. A job that used to be routine is now an uncertain and expensive undertaking in which the City decides the "right" way to repair your house, with no consideration of the cost, and you foot the bill.

What is in this district and is it worthy of all these extra costs?

Where most people think of historic designation applying to great architectural landmarks, or structures where broadly known, notable people lived, or where significant events took place, the truth is the newly designated buildings in Washington Square West are mostly perfectly nice, but not notable buildings, without any greater link to history than the vast majority of homes in the City. Many were built in the last 60 years, they have no notable history attached to them, and are owned by ordinary Philadelphians, who never dreamed of nor asked for a historical designation. This ordinariness can be seen by the lack of specific evidence in the nomination document, which devotes a median of 3 words to justifying newly designated buildings, while half of the properties have no specific justification at all. It includes an IHOP, an adult video store, a City playground and a row of 1978 garage-front houses.

Residents broadly opposed this district. When the Commission took public comment, 133 residents and owners wrote in opposition and 23 wrote in support: 85% against. It was designated anyway. The only change was to change the classification of some parking lots at the urging of powerful developers, so they could build on their lots unimpeded.

What follows is the record: what the district costs residents, who pays, who gets exceptions (developers and the City, not homeowners), and what was actually designated. The figures are the City's own, and can be verified against City permitting data and Historical Commission records.

Contents

	Key findings	2
	Summary	3
PART I	What designation costs	7
01	Same block, same houses, one new rule	8
02	The same repairs now need a permit	10
03	The \$1,450 preservation tax	13
04	And it all takes longer	17
05	Nothing for years, then all at once	19
06	Owners get no benefits and no help	21
07	"Not our purview": the Commission does not care what preservation costs	24
08	A hardship exemption designed for developers, not homeowners	26
09	Exemptions for the powerful: the City and developers	30
PART II	How this district was made	35
10	What the district actually contains	36
11	Written by a Commissioner, opposed by the neighborhood, adopted anyway	42
	Conclusions: What the record shows	44
	How this was measured	45

What designation costs

Measured in Washington Square West, the one Philadelphia district where newly designated houses stand beside already-designated ones on the same blocks. The cost figures are this district's. The rules that produce them are the same in every district the Commission creates: the permit requirements, the review, the hardship test and the absence of any help.

01	Same block, same houses, one new rule	8
02	The same repairs now need a permit	10
03	The \$1,450 preservation tax	13
04	And it all takes longer	17
05	Nothing for years, then all at once	19
06	Owners get no benefits and no help	21
07	"Not our purview": the Commission does not care what preservation costs	24
08	A hardship exemption designed for developers, not homeowners	26
09	Exemptions for the powerful: the City and developers	30

THE EXPERIMENT

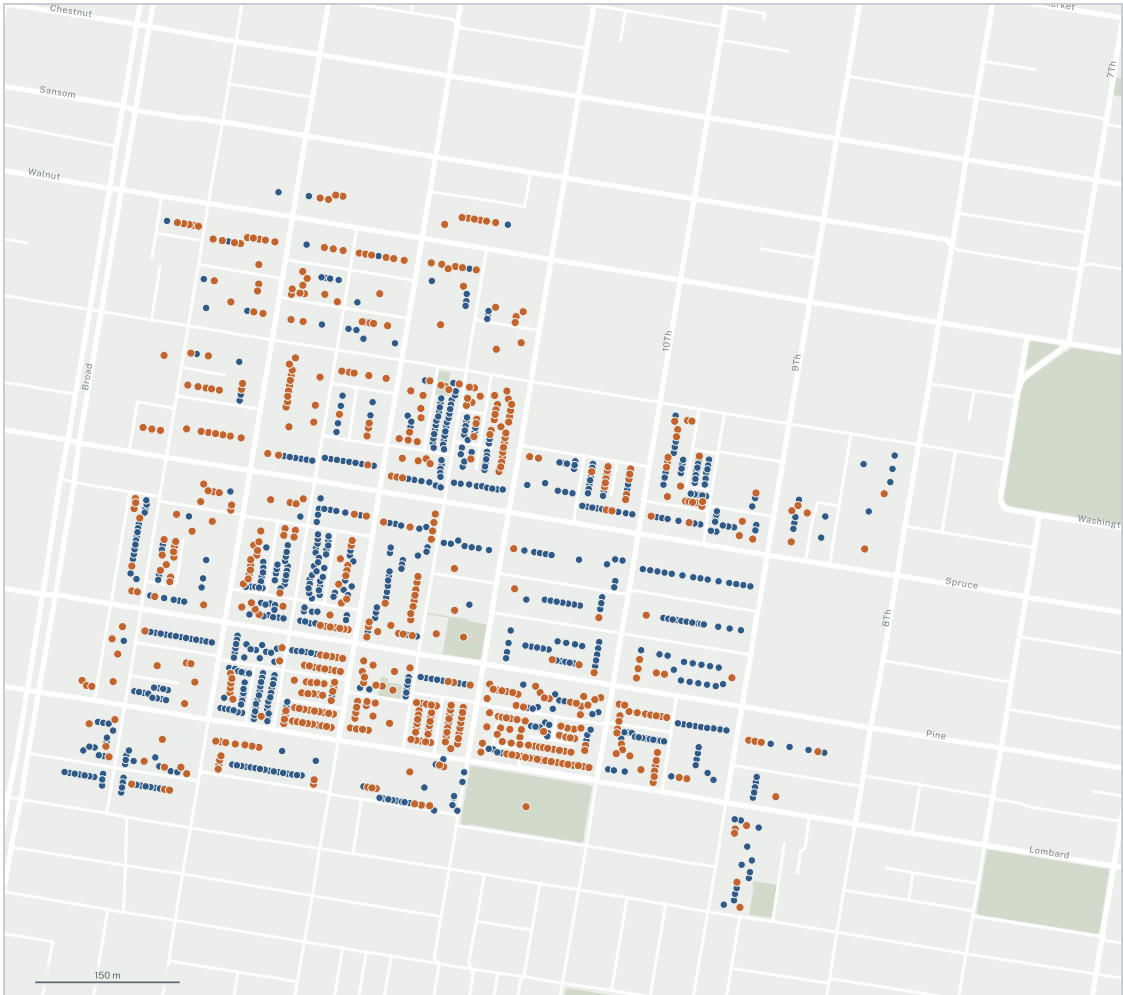
01

Same block, same houses, one new rule

Most arguments about historic districts compare designated neighborhoods with undesignated ones, which compares Society Hill to Kensington and proves nothing. Washington Square West allows something better.

When the Commission drew the district boundary it enclosed 719 properties that were already on the Philadelphia Register, most of them designated in mass votes between 1956 and 1969. Those owners had been living under Commission review for decades. The district added 618 that had never been designated. On 21 March 2024 all of them were notified, and under the City's own rules the Commission's authority over their permits began that day.

So there are two groups of houses, interleaved along the same streets. One group's rules changed in March 2024. The other's did not. Any difference in what happened to them afterward is the effect of designation, with the market, the contractors, inflation and everything else common to the neighborhood canceled out.



● Newly designated in 2024 (618) ● Already designated before the district (719)

Register addresses inside the Washington Square West Historic District, from the Philadelphia Register of Historic Places (February 2026) and the Office of Property Assessment. The district holds 1,337 register properties. The nomination's inventory has 1,441 sheets for them, because 69 buildings with several units or street addresses get a sheet for each.

The two groups before designation. Counts are register properties; medians are over single-parcel buildings, condominium units excluded

GROUP	PROPERTIES	MEDIAN YEAR BUILT	MEDIAN SIZE	MEDIAN ASSESSED VALUE
Newly designated	618	1920	2,247 sq ft	\$758,800
Already designated	719	1875	1,750 sq ft	\$713,650

Market values are about six percent apart. The already-designated group is older, which is structural: the oldest buildings were designated first.

02

THE WORK

The same repairs now need a permit

A rowhouse needs what it needs. Roofs fail on their own schedule, brick needs pointing, windows rot. Designation does not change how often a building needs work. It changes how much of that work has to pass through City Hall.

The City publishes a list of work a homeowner can do without a permit. It opens with a condition.

"As long as your property is **not on the Philadelphia Historic Registry**, you often don't need a permit for..."

CITY OF PHILADELPHIA, GET A BUILDING PERMIT

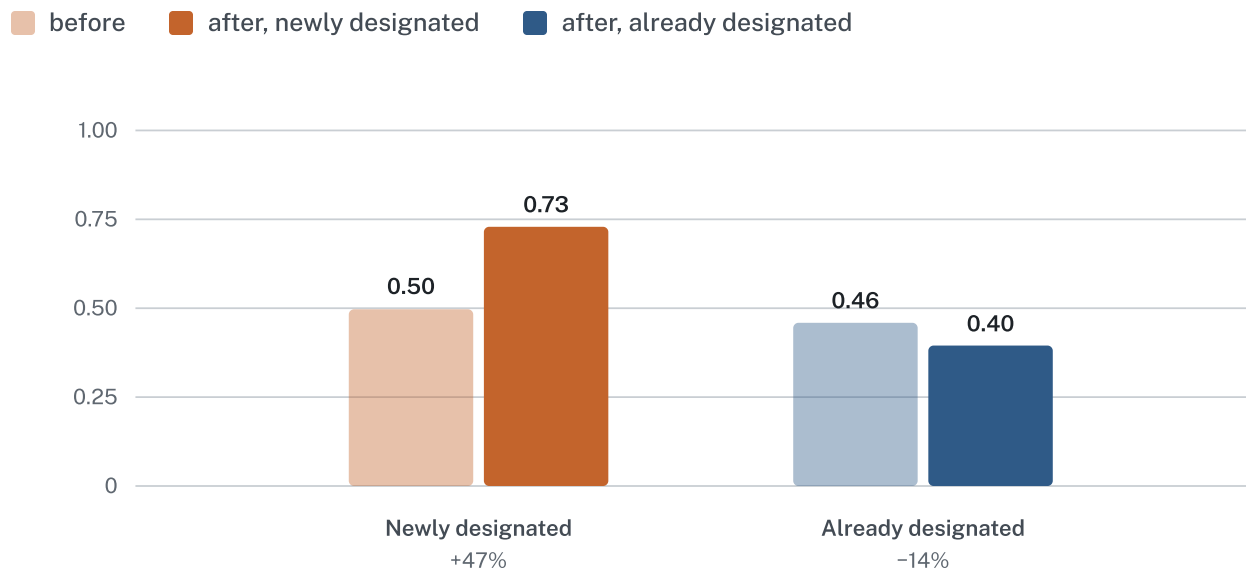
- ✕ Repairs related to regular maintenance
- ✕ Replacing doors and windows in one- or two-family dwellings
- ✕ Pointing masonry
- ✕ Sidewalks and driveways
- ✕ Fencing up to six feet
- ✕ Retaining walls up to two feet

Every one of those is permit-free for a Philadelphia house until the house is designated. Then repointing the brick, relaying the sidewalk and replacing a rotten window each become an application, and each application is reviewed by the Commission before a permit can issue.

The permit record shows exactly that. Measured from the notice date, permit activity at newly designated properties rose 47%. At already-designated properties on the same blocks it fell 14%.

Permits per property per year

January 2022 to August 2026, divided at the 21 March 2024 notice. New construction excluded. Rates are over properties that pulled at least one permit in the period.



One group's rules changed and its permit rate rose by half. The other's did not, and its rate fell. That difference is the effect of designation.

Owners were told something different while the nomination was pending. At a community meeting in May 2024, Paul Steinke, executive director of the Preservation Alliance, told owners that "the only time the historical commission gets involved is when you as a property owner are doing work that requires a building permit... If you don't need a building permit for the work you're seeking to do, then the historical commission doesn't get involved." What Steinke did not mention is that a whole lot of work that did not need a permit before would now require permitting. In addition, how the work gets done, what it looks like, and how much it costs would no longer be up to you. Steinke's framing significantly downplays the impact of the designation. The City's guidelines are clear on what permitting is required, and the permit record shows it happening.

03

THE BILL

The \$1,450 preservation tax

The average newly designated property now spends \$1,450 a year more on its upkeep than it would have without designation.

Most of it is work that used to be the owner's own business. A window replaced, a wall repointed, a fence rebuilt: before designation these needed no permit, were done with the owner's choice of material and contractor, and left no record. After designation each one is an application, priced to the Commission's standards by a contractor willing to deal with the Commission. The rest is that each permitted job now costs more, and the City adds its fee.

Some of that work would have been done anyway, for less and without a permit, and no record shows what it would have cost. The cases in this report show the gap: a \$2,000 door that became \$5,000, shutters priced at \$1,500 before designation and \$34,000 after, a \$500 window that became \$3,000, and \$30,000 more for wood windows in a building rebuilt after a fire. The record also misses costs running the other way: repairs put off, work done without a permit, and the cost of months of negotiation before an application can be filed. The \$1,450 is what the City's own records show.

For scale, set it against the tax the City already collects on these houses. The median newly designated single-family house is assessed at \$690,600 and pays about \$8,650 a year in real estate tax. The \$1,450 preservation tax adds 17% to that bill. Raising the same money through the property tax would mean lifting the rate from 1.40% to about 1.60%.

That is the average per property figure for the district. Most owners pay nothing in a given year and then a great deal in one, which is the subject of chapter 05.

Then the City adds its fee, on work the neighbor does for free

Residential permit fees from the City's published schedule, inclusive of the \$3 City and \$4.50 State surcharges on every permit

THE JOB	DESIGNATED OWNER PAYS	THREE DOORS DOWN
Repointing the brick assessed as an alteration	from \$260.50	\$0
New fence, under six feet	\$76.50	\$0
Rebuilding the sidewalk	\$76.50	\$0
Replacing windows and doors "permit only required if historical"	\$70.50	\$0
A \$20,000 job the fee schedule does not list 2% of the cost of the work	\$407.50	\$0

Because several fees scale with project cost, a costlier project also means a larger check to the City. A typical newly designated property's annual permit fees rose from about \$126 to \$219, up 74%, while already-designated neighbors' fell 9%. The median fee on a single permit went from \$253 to \$300. Set beside the cost of the work these are small numbers, and they are inside the \$1,450, not added to it.

Residents in their own words

The permit record can only show statistics on what was permitted. Many projects are abandoned due to cost. Others are forced into costly changes that are not captured on a permit form. Residents' letters to their Council member describe the reality.

"What should have been a simple home maintenance project became an extremely difficult and expensive process... Instead of being able to install a modern, energy-efficient door with new framing and improved insulation for approximately \$2,000, we were forced into a process that resulted in a refinished door costing us roughly \$5,000, and it still does not provide the improvements we originally needed."

Condominium owner, on the building's shared front door. A compliant replacement was quoted at \$13,000.

"When I had to replace my shutters prior to the historical designation, it cost about \$1,500. When my neighbor priced his shutters, which are practically identical to mine, following the designation, he got an estimate of \$34,000. Consequently, he decided he could abide dilapidated shutters, and his facade just looked bad until he finally decided to risk a fine and do the work without a permit. It is now thankfully restored to what it was."

Longtime district homeowner

"My family chose our house after confirming it wasn't historically designated. There's nothing historic about my house. It was built in the 70s. Yet we were designated despite our objections. It's resulted in an extra \$4k to fix our roof because our preferred contractor refused the job when he found out he'd need to deal with the historic commission."

Owner of a house built in the 1970s

"I had to forgo a replacement window job because the expense was outrageous given the requirements for new windows. I am 82 yrs. old and am like other senior citizens on a fixed income."

Homeowner of 48 years

"During that already difficult rebuilding process, historic requirements added even more expense and delay... We were required to use wood-framed windows rather than modern alternatives that would have looked virtually identical from the exterior. That requirement alone added approximately \$30,000 to the cost of the project, and the significantly longer lead time further delayed our ability to return home."

Homeowner rebuilding from a fire

The door is worth dwelling on, because the Commission's own record confirms it. In February 2025 the owners asked to replace a failing shared front door. They contacted the Commission first and were told any replacement had to be wood and closely replicate the original. Preservation suppliers quoted \$8,500 to \$10,000 for materials alone. When the owners offered affordable alternatives, the Architectural Committee denied them. One member said the Committee "does not need to concern itself with costs." When the owner said the prices felt like gouging, committee members answered that the quotes were "in line with the going rates for doors of a certain quality," and the executive director reminded him that unapproved work can bring violations, fines and court.

Work deferred or done without permits is also notable and creates additional costs on top of the Preservation Tax. The \$1,450 preservation tax does not account for work that was never done because it costs too much, the 82-year old homeowner above just has to live with their decaying windows. Another homeowner wrote: "I am deliberately delaying replacing rotting windows as I will not pay the exorbitant cost of historic windows." The \$1,450 also does not account for the unpermitted work to replace the shutters in the quote above because we could only measure what showed up in City permit records. Because the permit record cannot see any of this, the \$1,450 leaves it out entirely; on this count, the real cost of designation is higher.

04

THE WAIT

And it all takes longer

The work also takes longer, and the Commission decides what it will look like. Before designation, a permit for one of these houses was approved in about a week. A permit for an already-designated house next door took sixteen or seventeen days, and still does. After designation, the newly designated houses take eighteen. Designation did not slow the Commission down; it moved 618 houses onto the Commission's timeline, and that timeline is eleven days longer.

Median days from application to issued permit

GROUP	BEFORE NOTICE	AFTER NOTICE	CHANGE AGAINST NEIGHBORS
Newly designated	6 days	18 days	+11 days
Already designated	16 days	17 days	—

That clock starts when you file. It does not count the negotiation with the Commission that has to happen before you can file at all.

Designated work needs the Commission's approval of what you propose: the material, the profile of a window, the color of a door.

That back-and-forth frequently happens before an application exists, so it appears in no dataset and none of the figures here include a day of it. Eleven days is the floor, not the total.

The notice every newly designated owner received promised that the Commission "completes most reviews on the day of the submission. More than 95% are completed in five days or less." Asked for the basis of that figure, the Commission's executive director stated that it "was calculated several years ago," that "we did not create any records" in arriving at it, and that there is "no way to reverse engineer" it. Even taken at face value, it measures the wrong thing. The five days start when the permit application is filed. For work that needs no drawings, which covers most homeowner repairs such as windows, doors, roofs and pointing, the application must come with a form Commission staff have already approved. That can require a long negotiation on materials and design. Larger projects go to the Commission's public meetings, which the City says can take up to 60 days. Either way, the five-day clock never measures the negotiation. The City's claim (which it does not have the data to defend) is misleading by measuring only the brief permit processing timeline and not the time to get your initial historic approval.

One case shows the full arc. In November 2024 a Spruce Street owner was cited for installing new windows without a permit and "without approval from the Historic Commission." City records show the permit for that work was finally issued in May 2026. Eighteen months, to permit a window replacement that had already been done. None of that time is in the \$1,450. The money is only what the permit record can see.

05

WHO PAYS

Nothing for years, then all at once

The \$1,450 is an average cost per year across every newly designated property, and that does not tell the full story. Most owners pay nothing for years, and then pay several years' worth at once.

In the 29 months after notice, 78% of the 618 newly designated properties pulled no permit at all. Buildings do not need work on a schedule. They need it when the roof goes. Among the 108 properties whose permits declared a cost, the middle one spent \$22,500, a quarter spent under \$6,000, and a quarter spent over \$110,000.

The burden does not arrive as a bill each year. It waits, and then it lands on whoever happens to need a roof that season.

That is the hardest part to plan for. An owner can go five years with no cost from designation at all, then need windows, and find that the replacement now requires an approved material, a Commission sign-off, a permit and a wait, on a job that runs to five figures. For an owner on a fixed income the rational response is the one the 82-year-old in chapter 03 described: do not replace the windows.

The record also shows the alternative response. The shutter owner's neighbor eventually did the work without a permit rather than pay. The homeowner who described it drew the lesson: "If people can't

shoulder the burden, the net effect over time is damaging — damaging to property values, quality of life, and ultimately to the cause of preservation." Deferred maintenance and unpermitted work are both invisible to the figures in this report, yet are the natural consequence of burdensome historic regulations.

Washington Square West is not the first neighborhood to learn this. A homeowner in the Victorian Roxborough district, designated over local objection in 2022, wrote to the Council member with a warning from four years further on: "Repair costs have skyrocketed. Two homes on our block that attempted to comply with the regulations saw prices of \$4,000 per window with an 8-month approval process. What's more, several homeowners (including, embarrassingly, myself) were ripped off by unlicensed laborers because traditional contractors became unbearably expensive under historic protections." That is a different district, but the same unaffordable Preservation Tax.

06

Owners get no benefits and no help

Designation brings owners no tax credit and no help paying for what it requires. The City and the Preservation Alliance are nowhere to be found when it is time to pay for preservation, and property owners are left to afford the preservation tax on their own.

It does not qualify you for a tax credit

A commonly cited benefit of designation is money: that historic status unlocks tax credits and investment. In October 2025 the Preservation Alliance published an economic study, *Growing Through Preservation*, and its executive director has since cited its central figure in the *Inquirer* and elsewhere: \$4 billion of historic tax-credit investment in Philadelphia since 2010, generating about 2,500 jobs a year. The Historic Tax Credit is real, but it has nothing to do with the local Philadelphia register this district was added to.

There are two types of historic designation in Philadelphia. One is the National Register of Historic Places, run by the National Park Service. The other is the Philadelphia Register, run by the Historical Commission. They are separate lists with separate consequences.

Two registers, two entirely different sets of consequences

	PHILADELPHIA REGISTER	NATIONAL REGISTER
Who decides	Philadelphia Historical Commission	National Park Service
What it requires of you	Commission review and approval of any exterior modification	No requirements
Tax credits	None.	20% federal credit, income-producing buildings only. Not owner-occupied homes.

Every one of the 295 projects behind the Alliance's \$4 billion used credits that depend on listing on the National Register. Being on the local Philadelphia Register provides a property owner no tax credit or other financial relief.

Conversely, being on the National Register puts no restrictions on a property, while being placed on the local Philadelphia Register puts significant restrictions on what you can do with your property, and drives the \$1,450 Preservation Tax.

So a Washington Square West homeowner gets the obligations of the local register, but does not gain any benefit. Local designation brings the design review, the permits and the \$1,450 a year. It brings no credit, because the credit is attached to a listing on the federal register. The money the Alliance counts is real, but has nothing to do with the local historic designations they push for and try to associate it with.

It does not come with any help

Two institutions brought this district into being: the Preservation Alliance, which co-wrote and co-nominated it, and the City, whose Commission designated it. Neither contributes anything to the cost it created.

The City has no program that helps a designated property owner meet the Commission's standards. Its general repair programs are income-limited and are not aimed at the premium historic designation adds. It does collect permit fees, through Licenses and Inspections, on every piece of work the Commission's review turns from permit-free into permitted, and returns none of it to the owners.

The Preservation Alliance ended 2024 with about \$2.3 million in cash and certificates of deposit, ran a surplus of nearly \$600,000 on \$1.2 million of spending, and pays its executive director \$179,553. Its strategic plan lists as its fifth goal "Help property owners be preservationists." Its 2024 annual report describes what that meant in practice: inspections of the easement properties it already controls, and a \$30,000 online fundraising drive for two damaged churches. There is no fund, grant or program for a homeowner in a district the Alliance nominated who was quoted \$13,000 for a door.

So the cost of preservation falls entirely on homeowners. The organizations that sought the designation, with balance sheets many times the size of any household's, took on the advocacy and left the bill for ordinary Philadelphians who did not ask for any of this.

"Not our purview": the Commission does not care what preservation costs

What happens when an owner brings the cost to the Commission?

The chair of the Committee on Historic Designation opened every one of its recorded 2025 meetings with a version of the same reminder.

"We do not consider matters of financial hardship. There is a committee on financial hardship that makes recommendations to the Commission and therefore the financial hardship questions are not part of our job."

CHAIR, COMMITTEE ON HISTORIC DESIGNATION, OPENING REMARKS, 15 OCTOBER 2025

Across the thirty posted recordings of 2025, commissioners and committee chairs declared cost arguments outside their scope at least a dozen times in five meetings, most of them to developers and their lawyers. Homeowners who raised cost got a different answer. They were told their concern was mistaken, or that the price proved the point. Then they lost.

In January 2025 the Commission considered a district of apartment buildings in Northwest Philadelphia. One of them, Vernon House, is a 48-unit limited-equity cooperative whose tenants bought the deteriorated building in 1979 and have kept it affordable since. A resident told the Commission that "80% of our occupants are seniors, 40% are African American." Designation, she said, "would kill our naturally occurring affordability and, by extension, our ability to survive as a limited equity co-op," leaving them unable to afford "a new heating system" while "our building crumbles around our windows." The executive director of the Preservation Alliance answered: "there really is no evidence that historic designation kills affordability... That is a myth." A motion to leave the cooperative out of the district failed, 4 to 8. The district was designated, 10 to 1. Concerns of affordability from seniors set aside.

In July a homeowner in her twenties, whose house in Washington Square West had been designated ten months earlier, asked to replace a front door that no longer locked properly in summer. The door was not original. She had priced a custom wood replacement and could not pay for it: "I can't afford a \$13,000 door." She proposed a fiberglass door instead. The minutes record a committee member's view that the existing door "clearly has value, given the stated cost of a replacement," and that "it makes financial sense to keep the historic door." The committee recommended denial, and in August the full Commission denied the application.

Every committee points to the Committee on Financial Hardship when confronted with concerns of affordability. The Commission's posted minutes and recordings show that committee meeting once in 2025, with a single agenda item before it. What it decides, and who gets through it, is chapter 08.

THE WAY OUT

08

A hardship exemption designed for developers, not homeowners

When an owner tells the Commission a repair is unaffordable, the answer is the hardship process. Here is who has used it, what it asks of a homeowner, and who it was written for.

The Committee on Financial Hardship heard one case in 2025. The applicant was not a homeowner. It was a developer who holds several hundred parcels across the city, seeking forgiveness for a Fishtown rowhouse he had already rebuilt outside the scope of his approved plans: vinyl windows in enlarged openings, a new front door, an electric meter on the facade, none of the permit conditions met. In January he asked the full Commission to legalize the work, telling it that compliant windows would cost \$3,000 each against \$500 for vinyl, on top of holding costs of \$3,000 to \$4,000 a month. One member answered: "These are problems that should have been understood up front. I am sorry for the plight that you're dealing with... but our purview is to uphold the process and procedures." The Commission denied legalization, noting that this "could be considered a self-inflicted hardship," and suggested two ways forward: work out a fix with staff, or apply for hardship. He applied for hardship. At the committee's hearing in February, staff recommended approval, saying the building "could not have been rehabilitated for a profit" and that the Commission's task is "to endeavor to bring properties into compliance with the preservation

ordinance, not to punish." The committee voted to recommend legalizing the work, suggesting he look into adding grilles to the outside of the vinyl windows.

Set that beside the condominium owners on Spruce Street who needed a new front door. They asked first, offered alternatives, and were told the quotes were the going rate for a door of that quality. The route that succeeded was the one taken by the applicant with the resources to build first and ask afterward.

That is not an accident of who applied. The test itself is written for a business. Under the Code and the Commission's rules, an owner claiming financial hardship must show that the property "could not have been rehabilitated according to preservation standards in such a way that it would have provided a reasonable rate of return on the investment," in the words the hardship committee used in 2025. Applying for a hardship exemption requires the property's purchase price and seller, two years of gross income from the property, itemized operating expenses, debt service, cash flow and depreciation taken, every appraisal ever obtained, every listing for sale or rent with the offers received, and the owner's consideration of "profitable, adaptive uses." The Commission may then require, at the owner's expense, a ten-year pro forma of projected revenues and an internal rate of return on the equity invested.

A family living in its own house cannot satisfy that test, because a home is not an investment with a rate of return. It has no gross income to report, no depreciation and no listings. The rest of the checklist is a description of a rental building's books. An owner quoted \$13,000 for a door is being sent to a process designed to decide whether a developer's project still pays.

The rules do contain a second route, called unnecessary hardship, which the Commission's own text says was written "out of concern and consideration for low and moderate income persons." It is narrow. It applies to households under 80% of the regional median family income, which in 2025 means \$66,850 for a person living

alone and \$95,500 for a family of four, with discretion for fixed incomes and extraordinary medical expenses. To use it an owner submits a building permit application, a scope of work, cost estimates and two years of federal tax returns, so that the Commission can decide whether the owner is poor enough to be allowed a cheaper window. Even then the exemption is from restoration, not from review: the rules say "the preservation of basic form and rhythm rather than restoration" may satisfy the Commission in such cases.

Consider what that asks. A homeowner who has done nothing but own a house on a block the Commission chose is first told that the ordinary repair now needs approval, then told the approved version costs several times more, and then told that the way out is to hand over two years of tax returns and make the case, at a public meeting, that the family cannot afford its own home. The returns stay confidential under the rules; the claim does not. Most people will not do that. They will pay, or they will put the repair off, or they will do the work without a permit, which is exactly what the record in chapter 05 shows.

Put the two routes side by side and the shape of the system is plain. A developer with a good lawyer and an accountant has a workable path to relief. A homeowner has a path that the income test closes to many, and that asks the few who qualify to prove their poverty in public for the privilege of a plainer window. It applies to almost no one, yet it allows the Commission to say that a process for homeowners exists.

Thirteen years of minutes bear that out. From 2013 to 2026 the hardship and public-interest clause was invoked successfully nineteen times: sixteen for development companies, institutions and corporations, three for individuals demolishing derelict buildings, and not once to relieve a homeowner of the cost of a window, a door, a roof or a wall. The people this report is about earn too much to qualify for the one route and have nothing to offer the other. They pay the \$1,450 a year, and are told it is not the Commission's purview.

Exemptions for the powerful: the City and developers

The rules that bind a rowhouse on Lombard Street do not bind the City that wrote them, and they bend for anyone with a large enough project. Homeowners are the only party they hold.

The City does not seem to think historic regulations should be followed

Start with the park on the southern edge of the district: Seger Park, the City playground on Lombard Street between 10th and 11th. This was one of the few properties assigned a specific reason for why it was designated. Its “archaeological potential” for what may lie beneath its ground. On 5 and 6 December 2025, fifteen months into the designation, a contractor's excavator was trenching the ground inside the park beside the spray ground. For any designated homeowner that is work requiring a permit, and at a designated property every permit application goes to the Historical Commission before it can issue. The City's permit records show no permit issued for the park since it was designated, none for this excavation, and no violation. It was trenched anyway, with no permit on record and so with no historic review. The Commission's own monthly review logs, which list staff sign-offs made without a permit as well as with one, show no review of any work at the park, or preservation of the “archaeology” the City found needed designation the year before. Nobody is trying to say the City should not repair their parks, but the

City cannot have it both ways either by designating property owners over their objections, waving away cost concerns, and then ignoring its own regulations when it is convenient.



6 December 2025, inside the park

Trenching beside the spray ground, a few feet from the play equipment.

Some parts of the City do follow the rules and know how to work quickly to avoid historic regulation. In 2025 a district was proposed for the 6600 block of Blakemore Street in Mount Airy. The Philadelphia Redevelopment Authority had just acquired the corner property there for affordable housing. The Commission's minutes record what happened next: the Authority "applied for a permit for complete demolition prior to the Historical Commission mailing notice to the property owners and assuming jurisdiction," and the building came down before the Commission could review it. At the August 2025 hearing the Authority's representatives opposed including the lot in the district and "explained that the future plan for the property is the development of affordable housing." Staff reversed their earlier position and agreed; the Commission carved

the lot out by a vote of 9 to 2. When the City itself wants to build affordable housing, it demolishes ahead of the notice, argues its way out of the boundary, and the Commission obliges.

Eight weeks after Washington Square West was designated, the Commission considered a building the City itself owns: the former Police Headquarters on Race Street, the Roundhouse. Every member of the public who spoke supported designating it. The Commission's chair, local developer Zachary Frankel, argued against, saying the Commission was "being asked to consider whether the architectural history outweighs the public interest that the potential of this site has to offer." The Mayor's designee from the Planning Commission, Donna Carney, told the meeting: "This administration does not support designation at this time and has asked me as a designee to vote accordingly." The Commission's own staff had recommended designation, and so had its Committee on Historic Designation. The vote was 6 to 6 and the nomination failed: the chair and the five departmental designees against, the appointed members for. The minutes record the Commission's conclusion in one sentence: "It is not in the public interest to designate the property at 700-34 Race Street as historic at this time." When the building is the City's, the public interest and the costs of designation are reasons not to designate. When the building is a rowhouse on Lombard Street, the owner's costs are "not our purview."

The benefits that do exist go to developers

It is not true that designation carries no benefits at all. It is true that none of them reach a homeowner. The Zoning Code gives a designated property three things, and a Philadelphia land-use firm set them out for its clients in 2024 under the title "Using the Zoning Code for a Historically Designated Property to Your Advantage." A designated building in a residential or neighborhood-commercial zone may elect the broader commercial uses of a CMX-3 district. A designated building may add an accessory dwelling unit. A designated building that changes use or expands is exempt from the

parking it would otherwise have to provide. The firm's summary is that these provisions "encourage development of these properties." Each is worth money to someone converting a building. None is worth anything to someone replacing a window in the house they live in.

The classification of individual properties bent the same way. The nomination counted 21 vacant and parking lots as contributing for their archaeological potential. On 21 May 2024, the prominent Philadelphia law firm Ballard Spahr wrote to the Commission on behalf of the Parkway Corporation (which owns two of the lots), calling the nomination's case "a generalized statement" that "would be applicable to much of Philadelphia." Seventeen days later the staff recommended moving Parkway's lots, along with 17 others, from contributing to non-contributing, finding the claim of "archaeological potential" was "made without any evidence." The Commission adopted the change. The developers had their properties saved.

Homeowners asked for the same scrutiny, either to be excluded from the district or downgraded from contributing to non-contributing like the parking lots. At the hearing the Commission's executive director said staff had "reviewed every property carefully," yet no written review of any house was produced, and not one was reclassified. The staff's own memo regarding the parking lots said the Commission must demonstrate to property owners that their property qualifies. It held the lots to that standard. It never held the houses to it, and never explained why homeowners were owed less. The parking lot owners, one of them with Ballard Spahr for a lawyer, got a four-page memorandum and a reclassification. The homeowners got brushed off.

The hardship route of chapter 08 runs the same direction, and when the property is luxury condominiums, it works. In 2015 the developer of the Laurel, the \$350 million tower on the northwest corner of Rittenhouse Square, filed an economic hardship

application covering three designated buildings in the Rittenhouse-Fitler district. In March 2017 the Commission unanimously granted hardship for the largest of them, the Oliver H. Bair Funeral Home, and approved its complete demolition. The other two were kept after neighbors objected and were handed to Project HOME. The tower stands, and if you have \$2.8M available there are still units available (\$18M if you would like a penthouse).

On Washington Square, a developer did not even need the hardship route. In 2007 the Commission approved demolishing the rear of the Dilworth House, classified "Significant" in the Society Hill Historic District, to make way for a 16-story condominium tower, and classified the work as an "alteration" rather than a demolition, so no finding of hardship was required. It was the neighbors, not the Commission, who fought that approval: they litigated against the developer for eight years to the Commonwealth Court, finally losing in 2015, and the developer received the City's final approval in 2019. The Commission said yes to the tower at the first asking. Twelve years of lawyers were needed only to outlast the people who lived next to it (you too can live there starting at \$4.5M). Two luxury condominium developments cleared the Commission; a homeowner four blocks away cannot get a front door approved without a hearing, and a roof deck that might be glimpsed from the street is a proceeding. Nobody litigates a window.

So the system sorts by means. Developers have zoning bonuses written for them, a hardship test written for their books, and the money and time to carry a case through the courts. The City exempts its own park, its own housing agency and its own former police headquarters. Homeowners have none of that. They carry the cost, \$1,450 a year on the average house, with no support, so that the neighborhood will look the way preservation advocates prefer.

How this district was made

What was actually designated in Washington Square West, and how the nomination reached a vote.

10	What the district actually contains	36
11	Written by a Commissioner, opposed by the neighborhood, adopted anyway	42

What the district actually contains

Designation is granted to a district, not to a building. Every property inside the line is designated, whatever it is. In Washington Square West the line was drawn wide, and the case for most of what fell inside it is a single page with a few words.

The nomination runs to 1,481 pages because it carries an inventory sheet for every building in the district, 1,441 sheets for the 1,337 register properties. A sheet has a photograph, a set of descriptive fields (stories, bays, style, windows, doors, wall material), a classification of Significant, Contributing or Non-contributing, and two fields where a case for the building could be made: "History Notes" and "References." "Contributing" means the Commission counts the building as part of what makes the district historic; non-contributing buildings are still regulated.

For the 618 properties being designated for the first time, half have no text at all in the "History Notes" to explain why the building is being designated. Counting every word on the sheet about the building's history, its architect or anyone associated with it, and counting a blank as zero, the median newly designated property is justified in three words. Among the half that get any text, the median is fifteen words.

The words that are there rarely make a case. Not one sheet for a newly designated building names the criterion it is supposed to satisfy, and none explains why a building is "Contributing" rather

than "Non-contributing." The only newly designated sheets that cite any criterion are the 21 vacant and parking lots claimed for their archaeology, 19 of which the staff then found had no evidence behind them. The sheet for 1113 Rodman Street, a house built in 1968 and classified "Contributing," gives its entire history in one line: "1960 zoning application for complete demolition of previous c. 1840 building." The case given for designating the house is that the historic house it replaced was demolished. The nomination fills 1,481 pages without saying, for almost any house, why that house is in it.

The nomination's case for the district rests on real history: the neighborhood's role as the city's LGBTQ gathering place, its Black institutions, its early rowhouse builders, and its architects. But when it names buildings that carry that history, it names about two dozen of the 618 it added. Designating those buildings individually would have protected everything the nomination says matters. Instead it took in six hundred more, most with no stated reason at all.

Two sheets, reproduced in full, show what that looks like. The sheet for 2 Alder Court, one of thirteen courtyard houses built around 1970 and each classified "Contributing," carries no photograph of the building's facade at all: its two pictures are aerial views of a roof. The windows and doors fields are blank, and the survey note explains why: "Not visible from public right-of-way." All thirteen Alder Court sheets give the same two lines of justification: the architect's name and "Part of 13-property development including attached courtyard houses and townhouses." The houses supposedly "contribute" to a streetscape they cannot be seen from. The sheet for 415 Quince Street, a rowhouse the nomination itself dates to 1963, records its windows and doors as "Historic - wood" and classifies it "Contributing." The history field is empty. The only reference is "Field observation." The nomination's own photograph shows a mid-century brick house with a roof deck; whatever the windows are, they are not historic.

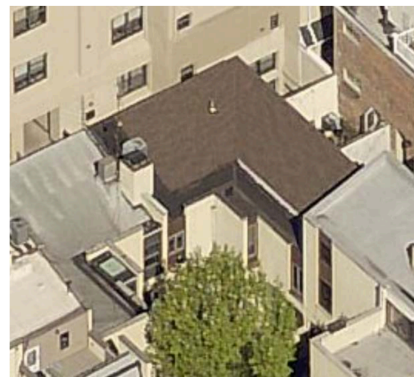
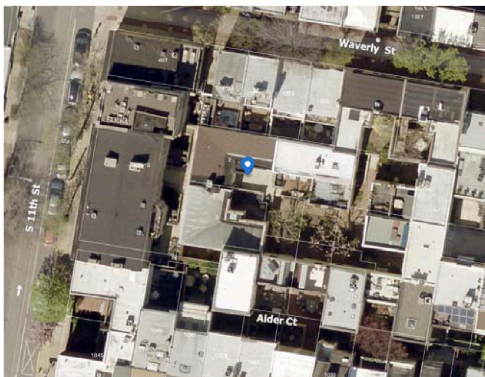
WASHINGTON SQUARE WEST HISTORIC DISTRICT INVENTORY

ADDRESS: 2 ALDER CT*Alt. Address(es):**Current Name:**PRHP Listed:**Historic Name:**NRHP Listed:* 9/20/1984 WWHD*Year Built:* 1970 +/-*Year(s) Altered:**Architect:* Louis Sauer*Historic Function:**Builder:**Hist. Resource Type:**Assoc. Individual(s):**References:**History Notes:*

Part of 13-property development including attached courtyard houses and townhouses.

Stories: 3*Bays:**Style:* Modern*Resource Type:* Courtyard house*Use:* Residential*Foundation:**Windows:**Roof Material:**Doors:**Exter. Wall Material:* Stucco*Ancillary Structure(s):**Add. Wall Material:**Landscape Features:* ☐ *Sidewalk:**Survey Notes:*

Not visible from public right-of-way.

**CLASSIFICATION:** Contributing

2 Alder Court, inventory sheet. Built "1970 +/-". No facade photograph. Windows and doors blank. "Contributing." Reproduced from the district nomination without alteration.

WASHINGTON SQUARE WEST HISTORIC DISTRICT INVENTORY

ADDRESS: 415 QUINCE ST*Alt. Address(es):**Current Name:**PRHP Listed:**Historic Name:**NRHP Listed:* na*Year Built:* 1963 +/-*Year(s) Altered:**Architect:**Historic Function:**Builder:**Hist. Resource Type:**Assoc. Individual(s):**References:* Field observation*History Notes:**Stories:* 2.5*Bays:* 2*Style:* Neo Colonial*Resource Type:* Rowhouse*Use:* Single-unit residential*Foundation:* Brick*Windows:* Historic - wood*Roof Material:* Asphalt*Doors:* Historic - wood*Exter. Wall Material:* Brick*Ancillary Structure(s):**Add. Wall Material:* Concrete*Landscape Features:* ☐ *Sidewalk:* Concrete*Survey Notes:*

Marble steps; concrete stringcourse; roof deck.

**CLASSIFICATION:** Contributing

415 Quince Street, inventory sheet. Built "1963 +/-". Windows and doors "Historic - wood." History blank. "Contributing." Reproduced from the district nomination without alteration.

Many of the newly designated properties are so new and unremarkable that it is unsurprising no justification for their designation exists. The nomination dates 187 of the 618 newly designated properties to 1960 or later: three in ten of the properties added in 2024 were built after 1960. 149 of the 187 are single-family houses.

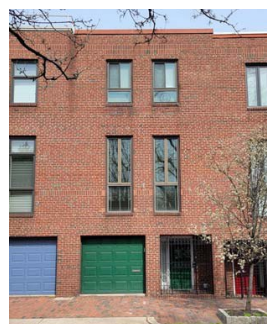
They are not scattered exceptions. On the 1000 block of Lombard Street, eight consecutive houses, 1001 through 1015, were built in 1978 with garages fronting the sidewalk. Classified non-contributing, the 1978 houses are still inside the district. Every permit for them goes to the Commission, and work that needs no permit outside the district now needs one.



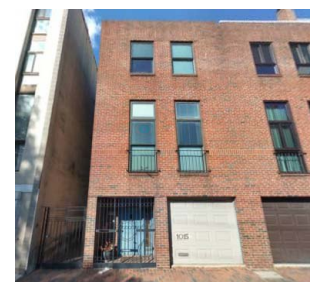
1001 Lombard St
built 1978 · "Non-contributing"



1007 Lombard St
built 1978 · "Non-contributing"



1009 Lombard St
built 1978 · "Non-contributing"



1015 Lombard St
built 1978 · "Non-contributing"

All four photographs are reproduced from the district nomination's own inventory, which dates each house to 1978, gives its style as "Other," and classifies it non-contributing.

Or take 1320-22 Walnut Street, an IHOP and a porn shop. The nomination's inventory sheet for it reads: Year Built 1965, Style "No Style", Windows "Non-historic - steel", Doors "Non-historic - other", History Notes "1956 photograph on PhillyHistory shows 3.5-story buildings on site." It illustrates the entry with two photographs. No explanation is documented as to why this building should be designated, but Philadelphians can feel safe knowing the iconic signage and awnings of both businesses cannot be altered without an official historic review.



1320-22 Walnut St, Walnut Street frontage

Nomination inventory photograph



Juniper Street frontage

Nomination inventory photograph

The nomination's answer to all of this is that it just declares a period of significance from 1740 to 1985. A period of significance that runs to 1985 takes in about 93% of the buildings standing in Philadelphia today, according to the Office of Property Assessment's records. The nomination's other organizing claim, the rowhouse form, describes two thirds of the City's buildings and 72% of its single-family homes. Together they are a definition of "historic" that encompasses essentially all of Philadelphia. Definitions of "historic" this broad devalue the term to the point of being meaningless.

That is how a district comes to include what this one contains. When there is no unifying theme for a district and what gets included is left up to the people who will do the regulating; playgrounds, porn shops, pancake houses and a row of 1978 garage-front houses qualify alongside the Federal rowhouses on Pine Street, and every one of them now needs the Commission's approval for each permit and pays the same \$1,450 a year.

THE PROCESS

11

Written by a Commissioner, opposed by the neighborhood, adopted anyway

The people who live in Washington Square West were asked what they thought. 85% of those who answered said no. They were designated anyway.

The district covers 1,337 properties and, because so many are condominiums, more than 2,750 individual owners, one of the largest designations in the Commission's history. When the Commission took public comment, 156 residents and owners put their views in writing. 133 were against. Only twenty-three wrote in support. 85% opposed the district. The only properties the Commission reclassified were the 19 vacant and parking lots of chapter 09. Not one house was reclassified, including those whose owners asked. The Washington Square West Civic Association, one of the two nominators, has since told the court it does not wish to defend the district, leaving the Preservation Alliance alone to do so.

At the September 2024 hearing the nominators described the nomination's author only as "a professional historian." The author was Emily Cooperman, a sitting commissioner since 2016, whom the University of Pennsylvania later called the "main author" of the nomination. She recused herself from the vote, after telling her colleagues she "was one of the authors of the nomination."

One resident described it this way in a letter to the district's Council member:

"I would also note the lack of support and consideration to the residents' opinion. This has been driven by an advocate who had no qualms about being a member of the commission itself."

Owner of a 1950s house in the district

Two other commissioners were challenged as members of and "Cornerstone Society" donors to the Preservation Alliance, the other nominator. The City's Law Department took the position that membership alone did not require recusal, and one of them, the chair, Robert Thomas, voted to designate.

Can you have a fair process where a nominating organization, the Preservation Alliance, retained a sitting commissioner to produce the nomination document, and 2 other commissioners are named donors to that nominating organization?

Can a commission made up of part-time commissioners be expected to properly review a 1,482-page nomination document? Even the staff who had already declared it reviewed were forced by the parking lot owners to go back and reconsider their work.

Can a district be justified when there is no common theme unifying it other than being made up primarily of rowhomes, and having been mostly built between 1740-1985? Criteria that would qualify at least 93% of the properties in Philadelphia today.

None of this is a technicality. It goes to whether a proceeding that bound 2,750 owners was fair, and whether the evidence for binding them was ever tested. Residents saw the shape of it and vigorously objected at the time. None of that mattered to a commission determined to designate.

CONCLUSIONS

What the record shows

This report has not argued that Philadelphia should stop protecting historic buildings. It has measured what one designation did to the people who live under it, and set out how that designation was made.

The record points one way. The district raised the cost of keeping a house by \$1,450 a year and gave nothing back: no credit, no help. It swept in playgrounds, porn shops, pancake houses and 1978 garage fronts, on a median justification of three words per newly designated property. The nomination was written by a sitting Commissioner, and adopted over the objections of the 85% of residents who wrote in. Now that owners have taken it to court, the local civic association, one of its two nominators, will no longer defend it.

Set that beside the rest of City government. One part is spending two billion dollars to keep housing affordable, \$34.7 million of it a year repairing homes so that people can stay in them. Another part has raised the cost of keeping 618 homes by \$1,450 a year in Washington Square West alone, and has at least six more districts in the pipeline, along with many individual nominations.

What Philadelphia does about the process that produced this district is a question for Council. The record assembled here is the starting point: designation is a cost, measured at \$1,450 a year on the average house; it falls on people who were not asked; and its only relief serves developers, not homeowners.

SOURCES AND METHODS

How this was measured

Treatment. The Philadelphia Register of Historic Places (February 2026), parsed to a first-designation date for each of 14,533 properties. A Washington Square West property is "newly designated" if its only designation is the 2024 district and "already designated" if it carries an earlier individual date. Commission jurisdiction attaches on the notice date under Code §14-1004(2) (b); notice letters were dated and mailed 21 March 2024, as confirmed by the Commission's executive director in June 2024.

Permits. City open data for all permits at cohort properties, January 2022 to August 2026, excluding new construction, additions, foundations and sitework. Declared project values are not published in the open data; they were retrieved permit by permit from eCLIPSE, the City's permitting system, for all 13,403 permits in the six-district cohort; the 1,021 Washington Square West permits among them feed the cost figures. Permit rates are computed per property per year, before and after notice, and the change for newly designated properties is compared with the change for already-designated properties on the same blocks over the identical period.

Property tax comparison. Office of Property Assessment 2025 market values and homestead exemptions for the 556 newly designated single-parcel buildings (272 of them single-family), taxed at the 2025 City and School District rate of 1.3998% on assessed value net of any homestead exemption. Medians are reported.

The annual cost. For each group, annual spend per property is the permit rate multiplied by the median declared project value, plus the permit rate multiplied by the median fee under the City's published fee schedule. The newly designated group's pre-notice spend is scaled by the comparison group's growth over the period to give what it would have spent without designation; the difference from what it actually spent is the cost of designation. Averaged over all 618 newly designated properties this is \$1,450 a year. Roughly four fifths of it comes from more permitted jobs at the

typical job's price, about a sixth from each job costing more, and the remainder from fees.

Housing policy. Mayor Parker's remarks and the H.O.M.E. plan targets from the City's release of 25 March 2025; first-year allocations from the Council-approved H.O.M.E. budget as reported in October 2025.

The nomination inventory. All 1,441 inventory sheets in the Washington Square West nomination (June 2024 version) were parsed field by field and matched by address to the 1,337 register properties; 69 properties carry more than one sheet (a sheet per unit or street address), and a property's fields are pooled across its sheets. Every figure in this report is stated per register property, so the 618 newly designated and 719 already designated properties are the same 618 and 719 throughout. The Commission designated the district on 13 September 2024 "with the reclassifications recommended in the staff memorandum on Criterion I dated 7 June 2024," which moved 19 vacant and parking lots from contributing to non-contributing and left Seger Park and the former St. Thomas Church site contributing; classifications quoted in this report are the nomination's except where that change is noted. A property is newly designated where the register shows no designation before the 2024 district. Word counts cover the History Notes, Architect, Historic Name and Associated Individuals fields together, summed across a property's sheets. Construction dates are the nomination's; a multi-sheet property takes its earliest. Non-contributing counts use the final classifications, and a multi-sheet property counts only if every sheet is non-contributing.

Citywide building ages. Office of Property Assessment public file, all records with livable area, vacant-land categories and building codes excluded (533,895 buildings, condominium units counted separately); 498,636, or 93.4%, carry a year built between 1740 and 1985. About four in five of those years are OPA estimates, mostly rounded to 1920, 1925 or 1950, all well inside the period. Rowhouses are records whose OPA building code begins "ROW": 353,661 of the 533,895 buildings (66%), and 329,487 of the 457,789 single-family houses (72%). The nomination's Criterion (f) claims the district as the origin of Philadelphia's speculative rowhouse; its inventory types 1,259 of its 1,441 sheets as "Rowhouse."

Commission decisions. All 420 sets of minutes of the Historical Commission and its committees posted by the City for January 2013 to July 2026, converted to text and searched for every action invoking Section 14-1005(6)(d).

Listings and pending designations. Condominium prices for the Laurel and the Dilworth House tower are asking prices on Zillow as of 29 September 2026. Pending districts are from the Historical Commission staff report of August 2026.

Review times. The Historical Commission's notice letter to owners of March 2024; the statement of the Commission's executive director to the Pennsylvania Office of Open Records, 15 April 2025; L&I information sheet PG_009, "Pre-requisite Approval Process in eCLIPSE for Philadelphia Historical Commission" (September 2020); and the Commission's Historic Property Approval Documentation Form (April 2022), linked from its Resources page.

Correspondence. Letter of Ballard Spahr for the Parkway Corporation to the Commission's executive director, 21 May 2024, in the Commission's posted owner comments; staff memorandum on Criterion I, 7 June 2024; correspondence between the Alder Court Homeowners Association and the executive director, 4 June to 6 September 2024, submitted to the Commission's record.

Public comment. Written submissions to the Commission on the nomination, tallied by name from the Commission's posted comment compilations and the two signed petition letters of 13 June and 12 September 2024.

Meetings. Commission and committee recordings posted by the City for 2024 and 2025, transcribed and quoted at the timestamp given; Architectural Committee and Commission minutes as cited. Court filings from the docket of Phila. C.C.P. No. 241202813.

All of the sources above are public records. The report, with video of the meetings quoted, is online at preservationtax.org.



PHILADELPHIANS FOR
RATIONAL PRESERVATION

preservationtax.org

Philadelphians for Rational Preservation · preservationtax.org · philly4rationalpreservation@gmail.com ·
September 2026

Every figure from public records