

PROTECTING HISTORIC INTERIORS

A Survey of Preservation Practices and Their Implications for Philadelphia

Prepared by the
Preservation Alliance for Greater Philadelphia
2007

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Cynthia Woods Mitchell Fund for Historic Interiors of the
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In 1993, the Pennsylvania Supreme Court determined that the historic designation of the Sameric Theater by the Philadelphia Historical Commission was invalid because the City's historic preservation ordinance did not explicitly include reference to the designation of interiors in the ordinance. In 2002, the Episcopal Diocese proposed, and subsequently carried out, a major interior renovation of the Episcopal Cathedral in West Philadelphia removing or altering many of the rich interior's historic features and changing the entire character of the historic space. This renovation was a reminder to the preservation community that historic interiors had no protection.

The concern for historic interiors emerged again in 2006 with the potential loss of a distinctive interior designed by Horace Trumbauer for the J.E. Caldwell's Jewelry Store, which had just closed. As Inga Saffron, architectural critic of the *Philadelphia Inquirer* noted in her article "City's grand spaces are going, going...." "This space was only one of a number of distinctive interiors in smaller commercial buildings that have or are being lost as a result of changes in retail businesses.

Out of concern for the loss of historic interiors, the Historic Preservation Committee of AIA Philadelphia asked the Preservation Alliance to examine the possibility of amending the City's Historic Preservation Ordinance to include the designation of interiors. The Alliance obtained a grant from the Cynthia Woods Mitchell Fund for Historic Interiors of the National Trust for Historic Preservation to research the experience with designation of historic interiors in other cities in order to evaluate whether a change in Philadelphia's historic preservation ordinance was appropriate and, if so, what type of change would most likely allow the designation of interiors to withstand legal challenge. At the time, we were only aware of the designation of a few historic interiors in Washington DC, Boston, and New York City. Much to our surprise, the research study conducted by Lori Salganicoff, Preservation Planner, documented that the designation of interiors was a component of preservation activities in many cities and in many states. In addition, the research indicated that the types of interiors that have been designated and successfully protected is much broader than we had realized.

The Alliance used the results of this research to evaluate whether the types of historic interiors found in Philadelphia would meet the designation criteria used by other cities. This analysis served as a basis for an examination of the types of changes that would be required if the City's Historic Preservation Ordinance were amended to include the designation of historic interiors.

This report is intended to serve as the basis for a public discussion about whether it would be appropriate to include interior designation in the City's Ordinance and, if so, how broad such designation authority should be. In addition to the research conducted by Lori Salganicoff, this report draws on research concerning court cases conducted by Elizabeth Burling for a course in historic preservation law at the University of Pennsylvania, and a paper prepared by Sass Silver for the Georgetown Law Historic Preservation Paper Series. We are grateful for the assistance each of these efforts provided in preparing this report.

ORGANIZATION OF THE REPORT

The report is organized in three sections:

Part One summarizes the findings from other cities, with a special focus on interior designation in Washington DC. It also includes a discussion of relevant court cases. A summary of the findings from all 20 cities in the survey is included in Appendix A.

Part Two identifies examples of historic interiors in Philadelphia and discusses how the criteria used by other cities would apply to these examples. It also includes a discussion of the changes that would be required to include the designation of interiors in the Philadelphia Historic Preservation Ordinance.

Part Three discusses what types of interiors in Philadelphia need protection and includes conclusions and recommendations for next steps.

We appreciate the encouragement of the Historic Preservation Committee of AIA Philadelphia without which this research would not have been undertaken. And we are grateful to the Cynthia Woods Mitchell Fund of the National Trust for Historic Preservation for providing a grant to support the research that is the basis of this report.

John Andrew Gallery
Executive Director

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PART ONE: DESIGNATION OF HISTORIC INTERIORS IN OTHER CITIES

A. SUMMARY OF INTERIOR DESIGNATION RESEARCH

Introduction

This section of the report summarizes information about interior designation ordinances and practices in a sampling of cities that protect historic interiors. The city list and survey were constructed from a number of sources including reviews of existing lists created by National Trust for Historic Preservation staff, the article “Interior Landmark Designation” from the Fall 1990 *NE Law Review*, the 2005 Master’s Thesis of Michele Kenney entitled “Historic Interiors: The Significance of Their Protection,” and the Spring 2004 paper “Not Brick by Brick: Development of Interior Landmark Designation Policies in Washington D.C.” by Sass Silver. Additional information was obtained from city websites; preservation agencies in all cities were contacted to confirm and update findings and provide additional information.

The resulting list of 20 cities (see table 1 on page x) is not intended to be a comprehensive list of all cities in the United States that designate historic interiors. The list includes those well known to protect historic interiors – Boston, Washington DC and New York, for example – as well as such cities whose practices may be less familiar as Los Angeles, Telluride, Oak Park, Charlotte, and El Paso. Understanding current practices in other cities, and designations that have and have not withstood scrutiny, may help Philadelphia to decide whether and how to protect historic interiors, and the types of interior resources that should and could be legally protected.

1. General Findings

The survey of the 20 cities listed in table 1 on the following page helped define a series of questions regarding each cities approach to interior designation. The survey data indicates that there are different approaches to such issues as ordinance language, types of resources protected, and requirements for public access and ownership.

a. Inclusion of Interior Designation in Local Ordinances

Of the 20 cities surveyed 14 had language in their local ordinances that specifically allowed for the designation of interior landmarks and/or interior features. (See discussion of distinction between landmarks and features, below.) In addition, two cities that did not mention interiors in their local ordinance (Long Beach and Los Angeles) are in the state of California where state-enabling legislation specifically mentions interior designations. In all, 80% of cities surveyed have state or local language that specifically allows for the designation of historic interiors. The remaining four cities – Delray Beach, Florida; Chicago, Illinois; and Seattle and Tacoma in Washington – base their designation on a

Table 1: Cities Surveyed and Key Data

City	Interior Designations in Ordinance	Interior Landmarks or Features	Public Access Required	Private Interiors Designated	Owner Consent Required
Long Beach, CA	No	Features	No	Yes	No
Los Angeles, CA	No	Features	No	Yes	No
Pasadena, CA	Yes	Landmarks & Features	No	Yes	No
San Francisco, CA	Yes	Landmarks & Features	Yes	No	No, seek it anyway
Telluride, CO	Yes	Landmarks	No, but required in practice	No	No, seek it anyway
Coral Gables, FL	Yes	Landmarks & Features	No, but required in practice	Yes, owner request	No, seek it anyway
Delray Beach, FL	No	Landmarks	Not known	Not known	Yes
Chicago, IL	No	Landmarks & Features	Yes	Yes	No, seek it anyway
Oak Park, IL	Yes	Landmarks & Features	Yes	No	No, seek it anyway
Boston, MA	Yes	Landmarks & Features	Yes	Yes, if accessible	No
Detroit, MI	Yes	Features	Yes	No	Yes
Ashville NC	Yes	Features	No	Yes	Yes
Charlotte, NC	Yes	Features	No	Yes	Yes
New York, NY	Yes	Landmarks	Yes	Yes	No
City of Rochester, NY	Yes	Landmarks	Yes	Yes	Yes
Portland, OR	Yes	Landmarks & Features	Yes	Yes	Yes
City of El Paso, TX	Yes	Landmarks	Yes	Yes	Yes
Seattle, WA	No	Features	No	Yes	No
Tacoma, WA	No	Features	No	Yes	No, seek it anyway
Washington DC	Yes	Landmarks & Features	No	Yes	No, seek it anyway

broad interpretation of the language in their ordinances that allows for the designations of buildings and structures.

b. Designation of Entire Interiors and/or Interior Features

Cities differ in choosing to protect complete interiors—generally referred to as Interior Landmarks—and interior architectural features. Interior features are typically defined as architectural elements essential to the character of the interior of a designated landmark. Such designated features can include specific architectural details such as stairs, trim decoration, partitions, woodwork, plaster, finishes and spatial/room configurations. In some cities, entire rooms are designated as interior features of landmark buildings; for example, the marble barbershop in Chicago’s Blackstone Hotel and the Palm Court Ballroom of the Alexandria Hotel in Los Angeles, CA. Both of these grand rooms help to tell the story of their landmark building and are included along with stairways, finishes and other interior details in their landmark designations.

When an interior is a building’s most distinct and important architectural feature, most cities (13) choose to treat these as Interior landmarks that may be designated on their own, such as with Washington, DC’s Eastern Market. More commonly, interior landmarks are recognized as part of an entire significant building. Of the 13 cities that landmark interiors, 8 allow for the designation of both interior landmarks and interior features.

Two examples of designations of interiors and interior features are Chicago’s Crown Hall, by Ludwig Mies van der Rohe, and the American Telephone & Telegraph Company Building in New York City.

Crown Hall, by Ludwig Mies van der Rohe, is an excellent example of a significant building designated both as a Landmark and an Interior Landmark. The City of Chicago designated Crown Hall in 1997 as a “masterpiece” of a master architect, describing it as follows: “designed to house Illinois Institute of Technology’s departments of architecture, planning, and design, the building’s dramatic, structurally-expressive form resulted from the need to create an open interior space that could be flexibly adapted for changing needs and uses. Instead of interior columns, the roof is hung from exposed steel trusses bridging the depth of the building.” Thus the open interior space was considered an essential component of the designation.

In April 2006, the New York Landmarks Preservation Commission designated the first floor interior of the American Telephone & Telegraph Company Building as part of its designation of the building. The interior was described as consisting of “the lobby spaces and the fixtures and components of these spaces, including but not limited to, wall and ceiling surfaces, floor surfaces, the steps adjoining the Dey Street entrances, staircase C, benches, entrance doors, revolving door enclosures, columns, grilles, doors, railings, chandeliers, wall clocks, and mailboxes.” The

designation report continues to describe that: “the Greek-inspired first floor lobby of the American Telephone & Telegraph Company Building, with its forest of polished marble Doric columns, is one of the great monumental classical interiors in New York City. Envisioned by company president Theodore Newton Vail as a grand corporate symbol, this dignified interior was designed to create an impression of quality, durability, and permanence expressive of the Telephone Company’s commitment to public service.”

c. Public Access and Designation of Public or Privately Owned Properties

The issue of public access seems to be linked to the issue of designation of publicly owned and privately owned properties for many cities. Public access is not always considered essential for interior designation. (See *Weinberg v. Barry*, in Section C.) Many cities, particularly those that designate Interior Landmarks, typically require some level of public access. However, many of these cities only designate the interiors of public buildings and do not designate interiors of privately owned buildings at all. Other cities do designate the interiors of privately owned buildings, in some cases when public access or public use is a customary part of the buildings operation. However, there are some examples of the designation of interiors in privately owned buildings even where there is no public access, including private residences.

In buildings that have some expectation of public access, whether private and publicly owned, designated interiors are typically limited to lobbies, hallways, auditoriums and other general public areas. Some cities define theaters and restaurants as publicly accessible, although there is a charge for admission or to dine in these spaces or to have access to them.

d. Owner consent

Owner consent is often influenced by whether owner consent is a requirement of a city’s ordinance for any form of designation. Thirteen of the cities surveyed do not require owner consent, but seven seek it anyway; however, five of these seven cities only designate publicly owned buildings.

e. Criteria for Designation

In cities that create interior landmarks, criteria for their designation specify that these must have the same character-defining features that qualify exteriors for landmark status. An interior is expected to possess such characteristics as integrity of location, setting, workmanship, feeling and association; be associated with significant events and/or people; embody distinctive characteristics of a type, period or method of construction; represent the work of a master or possess high artistic value; and/or yield important historical information.

Additional criteria for the designation of landmark interiors varies based on the type of interior, but most emphasize the distinct qualities of being unique, innovative, intact, and consistent with the style of the exterior. Private houses are characteristically designated in their entirety and on the basis of their link to an important person or architect.

f. Documentation and Enforcement

Historic designation in many cities in the survey requires a city council ordinance for each individual landmark building. In these cases, and perhaps in others, the historic property is described in some detail, including interiors when part of the designation. It is not clear whether these descriptions are supported by detailed photographs or other kinds of documentation. Some cities—Long Beach, Coral Gables, Boston for example—craft individual ordinances that describe the designated property in detail as well as subsequent requirements and sometimes preservation incentives.

Proposed changes to designated interiors are typically required to be reviewed prior to the issuance of building permits.

Clarity of criteria and regulations are of the utmost importance to enforcement. As noted by several authors, property owners have become accustomed to exterior designations and regulations; well-defined policies for interior designation would extend that acceptance to interior designations and regulations.

g. Incentives

Many of the cities that have enjoyed a positive and proactive response to the designation of landmark interiors and interior features have incentives in place. California, Michigan and North Carolina have state tax credit/deferral programs that encourage rehabilitation of locally designated properties, and calculate credits based on percentage of resource designated. Chicago, IL offers a 10% County tax credit for substantial qualified revitalization. In addition to a state tax credit for the rehabilitation of locally designated properties, Seattle, WA relaxes certain building code requirements. Some cities pursue preservation easements.

2. Designation Practices in Selected Cities

Appendix B contains descriptive information about each of the 20 cities in the survey as well as website addresses and contact information. The following information is taken from that appendix and provides information for cities with a similar magnitude and type of historic resources as Philadelphia, as well as for a few cities with special interior designation practices.

a. New York, New York

The Landmarks Preservation Commission was established in 1965 in response to New Yorkers' growing concern that important physical elements of the city's history were being lost. New York State Preservation Law, enacted in 1965, states as its purpose "promoting the use of historic districts, landmarks, interior landmarks and scenic landmarks for the education, pleasure and welfare of the people of the city." New York City's Landmarks Ordinance states: "the Commission is authorized to landmark an interior 30 or more years old that is customarily open or accessible to the public, or to which the public is customarily invited, and which has a special historical or aesthetic interest or value as part of the development, heritage or cultural characteristics of the city, state or nation." The 104 designated Interior Landmarks include the Marine Air Terminal at LaGuardia Airport, the RCA Building Lobby, and the Ed Sullivan Theater, and interiors in the Time & Life Building, National City Bank, and Daily News Building. Interior Landmarks need not also be designated as a building.

In 1993, TIAA challenged the designation of the Four Seasons restaurant within the Seagram Building. (See section C.) The courts upheld the City's designation because the Landmarks Ordinance did not require that the Commission obtain owner consent to landmark the building or interior.

b. Chicago, Illinois

The Commission on Chicago Landmarks was established in 1968 by City ordinance. It is responsible for recommending to the City Council that individual buildings, sites, objects, or districts be designated as Chicago Landmarks, thereby providing legal protection. The Landmarks Ordinance allows for designation of "such areas, districts, places, buildings, structures, works of art, and other objects having a special historical, community, architectural, or aesthetic interest or value to the City of Chicago and its Citizens." This does not specify the inclusion of interiors, but has been interpreted to do so.

Landmarks are considered individually at which a decision is made whether any interior spaces should be included. Each designation has its own ordinance. Those with significant interior design/elements/space are designated, whether or not these are public spaces. Owner consent is not required for designation. Where there is "non-consent/no response," a public hearing is required. Designated interiors are typically publicly accessible space such as lobbies, but not necessarily publicly owned. The question of public access has never been legally defined and is determined on a case-by-case basis.

As of February 2006, 282 Chicago Landmarks have been designated by the City Council, of which 122 properties include interior designations. A 10% County tax credit is offered for substantial qualified revitalization.

c. Boston, Massachusetts

The 1975 Massachusetts enabling legislation that created the Boston Landmarks Commission allows for the designations of interior spaces and features, and for the designation of interior landmarks within the Historic Beacon Hill District or Back Bay Residential District, which were designated earlier. Every individual landmark has its own standards and criteria.

The Commission staff estimates that 16-20 out of 80 landmarks have designated interiors. Some are just interiors (a very large theater inserted into a building with another purpose – only the marquee is designated at the exterior); others include lobbies of commercial buildings or dining areas of restaurants. Among the properties with interior designations are the Old Federal Reserve Bank, Gibson House Museum in Back Bay, the Boston Public Library (a very detailed designation, including furniture), Faneuil Hall (three floors), Olsen Depot (train station turned into a restaurant), Curley House (former mayor’s house now owned by the City and accessible to public), Keith Memorial Theater/Opera House, the Old State House and the Lange Theater (lobbies, auditorium).

Whether privately or publicly owned, a significant interior may be designated if it is deemed historically significant and is accessible. The only private residential building that has been designated is a former mansion converted to a condominium. The grand lobby can be seen through a glass door on the outside thereby meeting the “accessibility test.” Designation of interiors does not require owner consent since the landmark process does not require it.

d. Los Angeles, California

The Los Angeles Historic Preservation Overlay Zones Ordinance was adopted in 1962. When designating a property, the Cultural Heritage Commission typically considers the entirety of the resource – exteriors, interiors, and landscape features such as rocks and major plant life. Los Angeles has 835 individually designated local “monuments” (buildings, sites, structures, trees, rocks). The majority of designated sites cover entire properties, including private single-family residential properties and their interiors.

California’s Mills Act offers generous rehabilitation tax credits for appropriate work on elements identified in ordinances for designated properties. A property contract is required to obtain tax credits, which allows the local government to participate in the regulation of interiors. State environmental guidelines encourage and enforce looking at the totality of the historic resource.

e. San Francisco, California

Article 10 of the San Francisco Planning Code allows the city to designate interior features: it states “... for a publicly owned landmark, review of proposed changes

in major interior features.” It also allows for the designation of “significant public and quasi-public interior spaces.”

Depending on the property, San Francisco may designate entire interior spaces or may identify specific interior features as significant. Each landmark’s ordinance will specify the controls on that property. San Francisco has 12 interiors designated, out of approximately 250 total individual landmarks.

Although the ordinance allows for the designation of “quasi-public” interior spaces, this has been interpreted to exclude interiors of privately owned structures. However, if a public property is sold to a private concern, the existing designation stands. This may be challenged soon, as the San Francisco City College was designated a few years ago and recently sold to a private individual who might convert it into a nightclub/restaurant.

There have been few legal challenges to interior designation. One is in process. 1032 Broadway, a privately owned property, is a significant cultural 19th Century interior because there were important “salons” there. While it has been designated as a landmark, the interior is not included in the designation. However, under California Environmental Qualities Act, (like a state 106 review process) San Francisco determined that the interior is historically significant and subject to review. That is currently being challenged, and will probably go to the state Supreme Court.

f. Pasadena, California

The historic preservation ordinance for Pasadena states that “a historic monument designation may include significant public or semi-public interior spaces and features.” However, Pasadena has so far only designated interiors of structures designed by Greene and Greene; these are designated as “monuments.” 110 Greene and Greene buildings have been designated Historic Monuments. The buildings are described and protected inside and out. The protection of the Greene and Greene interiors is a result of City Council action in response to the destruction of the interior of Greene and Greene’s Blacker mansion. Pasadena has found that the difficulty in designating interiors is documenting the integrity of the original design. This is easier with Greene and Greene buildings and some of the other architect-designed Craftsman houses.

Although the interiors of major public buildings are not designated, the City’s municipal code requires that all historic publicly owned properties be reviewed by the design commission and/or the historical commission. Pasadena can also regulate non-designated interiors through the Mills Act property agreements, which are required to obtain state tax credits.

g. Oak Park, Illinois

The Historic Preservation Commission, established in 1972, evaluates proposals affecting the Village's landmarks and historic districts. Five of the 22 landmarks in Oak Park have designated interiors and interior features.

The Ordinance defines protected “Interior Architectural Features” as well as “Interior Historical Landmark”:

- *Interior Architectural Features*: The architectural character and general composition of the interior of a structure, including the room design and configuration, color and texture of materials, and the type, pattern and character of all architectural details and elements, including, but not limited to, staircases, doors, hardware, moldings, trim, plaster work, light fixtures and wall coverings.
- *Interior Historic Landmark*: An interior, or part thereof, which is normally open or accessible to the public and which has a significant historical or aesthetic interest or value as part of the development, heritage or cultural characteristics of the Village, State of Illinois or United States and which has been designated as an interior landmark pursuant to the provisions of this Article.

Interior Historic Landmarks are designated based on historical/cultural importance, architectural/engineering importance, age (50 years old), and possessing sufficient integrity of location, design, materials and workmanship to make it worthy of preservation or restoration. However, the Village board can deny designation of any historic landmark, irrespective of whether or not the proposed landmark satisfies one or more of the above listed criteria.

The five designated interiors are located in the Frank Lloyd Wright Home & Studio, Unity Temple, the Ernest Hemingway Birthplace Home, and The Plaza Hotel (lobby/foyer area including the four-story atrium with a turned spindle latticework stairway, the ornamental stained and beveled glass door surround between the foyer of the original building and the former dining area in the addition, and the two brick archways leading off from the foyer area).

Oak Park does not require owner consent, but typically seeks it.

h. Charlotte, North Carolina

The Commission was created in July 1973 by joint action of the Charlotte City Council and the Mecklenburg County Board of Commissioners. Charlotte draws all of its powers and language from the North Carolina enabling legislation, which allows for the designation of publicly owned significant interior features as well

as privately owned features where the owner has given consent. This consent is included in the property's deed, and is binding on future owners.

Of the 300 historic properties that have been designated about 75% include interiors. North Carolina state law allows for up to a 50% (depending on the amount of property designated) tax deferral for a locally designated historic property. If only the exterior is designated, only a percentage is considered. If interior and exterior are both designated, the full 50% is possible. The tax deferment lasts for 100 years, but is recaptured if the designated property is altered or demolished. Many property owners are attracted to designation because of the 50% tax reduction.

B. CASE STUDY: WASHINGTON, DC

Washington DC's preservation ordinance does not explicitly authorize designation of interior landmarks. An historic landmark is defined as a building, structure, object or feature and its site, or its site apart from a building. There is a presumption that this includes interiors. This is supported by language elsewhere in the ordinance describing character defining features ("The character of a historic interior may be defined by features such as room configurations, spatial relationships, stairs, trim, and decoration, and by materials such as partitions, woodwork, plaster and finishes.") and permit requirements ("An application involving an interior historic landmark shall include architectural plans sufficient to indicate the nature and design of proposed interior work. Plans may be in the form of or include annotated photographs." "...The removal or destruction of all or a substantial portion of a designated interior landmark, unless the elements to be removed lack physical or historic integrity, or are not character-defining features; or " any removal or destruction requiring a partial demolition or raze permit under the D.C. Construction Code, including any demolition of non-bearing walls, interior finishes, or other interior non-bearing elements within a building where an interior space has been designated as a historic landmark.")

Interior designation in Washington DC was the subject of a very helpful paper prepared by Sass Silver for the Georgetown Law Historic Preservation Paper Series, May 2004. "Not Brick by Brick: Development of Interior landmark Designation Policies in Washington DC" presents a careful and thoughtful analysis of the history of interior designation in the city. The paper examines the designation of eleven interiors organizing these by five building types: apartment buildings, private houses, banking institutions, interiors that are special features, and movie theaters. The following is a summary of the findings and conclusions of the paper.

1. Apartment Buildings

Four apartment buildings have received interior designation. All were found to share the following characteristics:

- The interior is a continuation of and counterpart to the building’s exterior architectural style;
- The building is associated with a prominent architect or developer;
- The buildings represent a changing shift in social and cultural values that made apartments an acceptable alternative to a single-family home.

Interior designation of apartment buildings includes lobbies, hallways and general public spaces, when found to compliment and reinforce the architectural style of the interior. Silver concludes that as far as apartment buildings are concerned the Historic Preservation Review Board “has developed a rigorous and clear rationale for the awarding of interior landmark designation.”

2. Private Residences

Interiors of private residences are designated in their entirety. The two private residences that have been designated share common characteristics:

- Their design concepts “aimed at capturing the aesthetic and feel of a particular era and type of architectural style”;
- Their commissioning residents were important persons in Washington, DC.

Both residences designated are lavish private homes and outstanding examples of a particular architectural style. In addition, the Christian Heurich Mansion (1892-94) contained unusual technological innovations for the time: the entire house had indoor plumbing and was wired for electricity. However, it should be noted that both of the properties designated—the Heurich Mansion and the Alice Pike Barney Studio House—are now in public ownership and were not private residences at the time of designation.

3. Banking Institutions

The interiors of two banking institutions have been given landmark designation. Silver observes: “Each seems to have been selected for designation in an attempt to epitomize the bank-type style of architecture that prevailed before FDIC insurance made it less necessary for banks to project financial strength through classical architecture.” The designated interiors also extend the architectural character of the exterior, as was found to be the case with interiors of apartment buildings—and important characteristic and one deemed to be important for interior designation in Washington, DC. It should be noted that interior designation did not include distinctive architectural spaces that were not connected to the public areas (board rooms on upper floors) or that were not directly connected to the exterior.

4. Interior as the Most Notable Feature

The designation of two interiors is based upon the uniqueness of their interior spaces. One is the Eastern Market (1873), the only public market building that retains its original

interior, and the other is the Chevy Chase Arcade (1925), a commercial arcade based on European precedents. The defining character justifying designation of each was the unique character of the interior space.

5. Movie Theaters

Two examples of neighborhood movie theaters are discussed, one of which was designated and one of which was not. Criteria for designating the theater interiors is not as clear as criteria in other cases. The approved designation was for a theater that was considered a “good remaining example” of a suburban movie theater. Silver questions whether this is sufficient justification for interior designation. In the case of the theater for which designation was denied the interior had been remodeled and much of its original design altered. However, in the case of a third theater interior (the Senator Theater) designation was denied even though the theater was intact on the grounds that the interior did not enhance the exterior character of the building.

Conclusions

In addition to the specific criteria identified for different building types, Silver concludes that certain general characteristics are common to all these designations:

- The interiors are publicly accessible or have the “potential” for future public access;
- To be designated interiors should be one-of-a-kind or the epitome of its building type and architectural period; and
- The designated interior should be intact with respect to original features.

C. RELEVANT COURT DECISIONS

There have been very few court decisions regarding interior designations. Elizabeth Burling conducted a survey of such decisions for a course on historic preservation law at the University of Pennsylvania, which found only four explicit precedents. The same decisions are cited in Sass Silver’s paper on Washington, DC, interior designations. The four cases cited and summarized below are:

- *Weinberg vs. Barry*, Washington DC
- *Sameric Corp. v. City of Philadelphia*, Pennsylvania
- *Teachers Insurance & Annuity Association v. City of New York*, New York
- *Society of Jesus v. City of Boston*, Massachusetts

1. *Weinberg v. Barry*, Washington DC

Weinberg v. Barry (1986) considered the issue of interior designation as a violation of the Fifth Amendment’s prohibition on takings without just compensation. Related to this

takings clause, the plaintiffs argued that no designation of a building interior could serve a valid public purpose unless the government requires public access to the building. Requiring public access would address this issue, but would then result in an invasion of private property. Based on the D.C. Preservation Act's definition of public benefit to include visual enjoyment as well as attracting visitors and tourism, the court determined that public access is not essential to public benefit. Furthermore, any private use that depends on public patronage, such as a hotel, theater, or department store, would permit the public to view and enjoy the resource. The designation was upheld.

2. *Sameric Corp of Chestnut Street Inc. v. City of Philadelphia, Pennsylvania*

In 1993, the Pennsylvania Supreme Court found that the Philadelphia Historic Preservation Ordinance did not explicitly authorize the designation of interiors as historical. *Sameric Corp. of Chestnut St. Inc., v. City of Philadelphia* challenged the interior and exterior historic designation of the Boyd Theater. The designation had been upheld by the Appeals Court as recognizing the work of a prominent Philadelphia architectural firm and the significance of the theater's interior as a rare and intact architectural and historical example. The state Supreme Court overturned this decision—despite noting several remarkable interior features—based on a strict reading of Philadelphia's Preservation Ordinance and its failure to specifically address the designation of historic interiors. The designation of the entire property was denied and a subsequent attempt to have the exterior alone designated was rejected by the Philadelphia Historical Commission in 2002 on the grounds that it was the interior that was significant.

3. *Teachers Insurance & Annuity Association v. City of New York, New York*

The designation of interior features was challenged in *Teachers Ins. & Annuity Assoc. Of Am. V. City of New York*, also in 1993. The interior of the Four Seasons Restaurant in New York's Seagram Building was designated a landmark, including the lobby, Grill Room, Pool Room, walnut bar, and wall, ceiling and floor surfaces. Using Washington's *Weinberg* case as a precedent, the court found that a restaurant, like a theater, is a place into which the general public is customarily invited and therefore publicly accessible. The court also clarified that interior features integral to the design of the interior space warrant inclusion in a designation, while those that merely enhance the interior's ambiance would not. The court also found that the potential for future conversion to private use should not be a consideration when assessing an interior landmark. The interior designation was upheld.

4. *Society of Jesus v. City of Boston, Massachusetts*

The separation of church and state as it relates to the designation of historic interiors was considered in the 1990 decision of the Massachusetts Supreme Court in *Society of Jesus v. Boston Landmarks Comm.* The Commission had designated elements of the interior of The Church of the Immaculate Conception. As the court described it, "The designation restricted permanent alteration of the 'nave, chancel, vestibule and organ loft on the main floor—the

volume, window glazing, architectural detail, finishes, painting, the organ, and organ case.” Relying on the state constitution, the court upheld an earlier ruling in which it had approved landmark designation of church exteriors to the extent they were “open to view from a public way.” However, the court concluded that the designation of an interior space “is substantially more invasive, reaching into the church’s actual worship space.” The interior designation was denied.

D. CONCLUSIONS

The number of cities recognizing and protecting historic interior landmarks and features is surprising and impressive. The criteria and practices used by most cities surveyed are similar, and are supported by the few relevant court decisions that have been found. Based on the survey of 20 cities, the more careful analysis of interior designation in Washington, DC, and the relevant court decisions, the following conclusions can be drawn about interior designation of historic properties.

- Explicit authority to designate interiors should be provided in the city’s historic preservation ordinance.
- Such authority should include the ability to designate complete interiors (“interior landmarks”) and interior features if the city wishes to be able to designate both;
- Designation documents should document the interiors or features to be protected in a detailed and explicit manner;
- Criteria for designation of interior landmarks should include the same character-defining features and history that qualify exteriors for significance. Preferably, interiors designated as landmarks should be unique or special, innovative, intact, and consistent with the style of the exterior when that is also designated. Criteria should be clearly defined, including the number of criteria that must be met for interior designation and whether or not owner consent is required.
- Interior features to be designated may include specific architectural details such as stairs, trim decoration, partitions, woodwork, plaster, finishes and spatial/room configurations.
- The ordinance should define whether public access is required and if so what constitutes such access (i.e., is “visibility” included). When access is required, it should be clear that interior functions that customarily invite the public to enter constitute public access. If public access is not required, the criteria for designation of private non-accessible interiors need to be clearly stated.
- Such incentives as tax reduction are helpful in obtaining public support for interior designation.

PART TWO: PHILADELPHIA INTERIORS AND ORDINANCE CHANGES

A. HISTORIC INTERIORS IN PHILADELPHIA

The analysis of interior designation described in Part One provides a framework for examining interiors in Philadelphia and determining whether they would meet the criteria for designation found in other cities. The paper on interior designation in Washington DC examined interiors by building type (apartments, residences etc). This analysis for Philadelphia is based on a similar organization by building type. The interiors mentioned as examples are not intended to constitute a comprehensive list of all such interiors in Philadelphia. The discussion of Philadelphia interiors is organized in the following categories:

- Apartment/ Condominium Buildings
- Hotels
- Banking Institutions
- Private Residences
- Interior as most notable feature
- Public Buildings
- Religious Buildings
- Cultural and Educational Institutions
- Theaters
- Office Buildings
- Small Commercial Buildings

In some cases, buildings have been converted from one category of use to another. For example, the Girard Trust building and the PSFS building were both originally banking institutions and are now hotels; the Ben Franklin Hotel is now an apartment building. For the purposes of analysis buildings are placed in the category of their **current use**, as that is the use that would have to meet the criteria for historic interior designation now.

1. Apartment/ Condominium Buildings

The criteria for the designation of interior spaces of apartment buildings derived from the experience of other cities includes:

- An interior architectural character that is consistent with and extends the architectural character of the exterior;
- Spaces that are generally accessible to the public, such as lobbies, hallways and general public spaces;
- Association of the building with the social and cultural history of the city;
- Interiors that are intact in terms of original architectural features.

Four apartment buildings in Philadelphia that appear to meet these criteria are: Alden Park Manor The Drake, Ben Franklin House and the Ayer. *Alden Park* (1920) is a unique apartment complex. It was designed as a luxury cooperative for families that wanted to live in a park-like setting without having to worry about maintenance. The buildings are architectural distinctive. The entrance lobby of the Manor would appear to meet the criteria for designation. It links the three apartment towers, extends the architecture of the interior, contains special architectural features such as a massive fireplace, is intact in terms of its original design and is accessible to the public.

The Drake (1929) is designed in a Spanish Baroque style with ornamentation based on themes related to Sir Francis Drake. This distinctive architectural character carries into the entire first floor including both the lobby and bar area. These areas are publicly accessible and intact. Ben Franklin House (1923-24), originally a hotel is now an apartment building. However, the conversion retained the grand lobby and ballroom. These spaces are publicly accessible and inter-related. Both have a rich architectural character that extends the character of the exterior of the building. Both buildings have a place in the social and cultural history of the city.

The Ayer (1929), formerly the N.W. Ayer office building, is now being converted to condominiums. The entrance lobby is an outstanding example of Art Deco design, including the integration of architecture and art. The interior is a direct extension of the architectural vocabulary of the exterior.

These examples indicate that there are and are likely to be other apartment buildings in Philadelphia whose interior spaces meet the criteria found for interior designation in other cities.

2. Hotels

Designation of the interior spaces of hotels can be justified by essentially the same criteria described above for apartment buildings. This can be seen in five examples.

The Bellevue (1902-12): The interior lobby and grand ballroom of the Bellevue have an architectural character that is an extension of the exterior character of the building. These spaces are not only publicly accessible, but the functioning of the hotel depends on public access to them. The interiors are intact, in spite of other renovations to the building, and the building and these interior spaces have been important in the social and cultural history of the city. The Bellevue also contains another distinctive interior space—the Rose Garden. However, the lack of connection to the exterior and to other interior spaces of note would suggest that the Rose Garden might be a less likely candidate for interior designation.

The Ritz Carlton Hotel, formerly the Girard Trust Bank (1905-08), is an excellent example of an interior that extends and enhances the architecture of the exterior. The grand rotunda is one of the city's most distinctive interior spaces. Public access is essential to the operation of the hotel. The building's history is a part of the economic

history of the city and the interior rotunda retains many of the characteristics of the former banking room. This interior could also qualify as the most notable feature of the building since it was virtually the entire interior of the McKim, Mead and White building.

Loew's PSFS Hotel (1930-32) is similar to the Ritz Carlton. Formerly a bank, the conversion to a hotel retains the distinctive entrance lobby, stairs and escalators; the public areas of the second floor; and the second floor banking room. Once again, all are accessible to the public and are essentially intact in terms of their overall architectural style. Here the banking room is clearly an extension of the exterior architecture, which features the second floor banking room in a very prominent manner.

The bank's board room and the adjacent terrace on the top floor of the building might not qualify for interior designation, in spite of their distinctive character and relationship to the exterior character of the building, due to their lack of connection with other areas of public access. The designation of these spaces would require careful consideration.

These examples suggest that interiors of some hotels in Philadelphia are likely to meet the type of criteria used for designation of historic interiors in other cities.

3. Banking Institutions

The criteria for banking institutions also includes architectural relationships of the interior and exterior, public access, and relationship to the social and economic history of the city. Silver's comment that banking institutions designated in Washington DC represent a time when architecture was essential to convey financial strength is also of interest. These criteria would fit such current bank buildings as the *Fidelity Building/Wachovia Bank* on Broad Street, and such smaller banks as the *Beneficial Savings Bank* at 12th and Chestnut. Both of these have a distinctive interior banking room that is an extension of the exterior architecture of the building, and which is accessible to the public. The Beneficial Savings Bank is an excellent example of a bank that would meet the designation criteria used in Washington DC. It was designed by noted architect Horace Trumbauer and is an early example of a Classical Revival commercial building and it has a rich connection to the city's history having been founded by St. Joseph's Hospital to provide banking services to the working classes of Philadelphia.

There are undoubtedly many other small bank buildings in the city that would also meet these criteria for interior designation.

4. Private Residences

Criteria for designation of interior of private residences in other cities include the Greene and Greene example in Pasadena and the examples in Washington, DC. The Pasadena example suggests that interiors that are both integral to the entire architectural expression of the residence and associated with an architect of special importance are appropriate for interior designation. Three examples in Philadelphia would fit this type of criteria. Louis I. Kahn's *Esherick House* (1960) in Chestnut Hill is a rare example of Kahn's residential

work. The interior was designed by Kahn and is integral to the overall architectural character of the building. The same is true of the interior of *Robert Venturi's house for his mother* (1962), also in Chestnut Hill. Richard Neutra's house in East Falls for Henry Sawyer would also meet these criteria.

The criteria used in Washington, DC, place emphasis on the elaborateness of the residential architecture and the association with an important commissioning resident. Examples that fit this definition might include the *Powell House* in Society Hill and *Mt. Pleasant* in Fairmount Park. While neither is currently a private residence, both fit the type of residential interiors designated in Washington DC. The *Disston Mansion* in North Philadelphia and the *Oaks Cloister* in Germantown are both currently private residences that would also meet these criteria. Each has an association with a commissioning individual important in the history of the city. The Disston Mansion is associated with two important individuals (the Disston family and Father Divine) and has distinctive and elaborate interiors that have been well preserved. Oaks Cloister is an even stronger example of a private residence for which interior designation would be justified. It is associated with an important individual, who was also the architect and principal resident of the property—Joseph Huston, architect of the Pennsylvania State Capital building. The interiors are lavish, extremely well preserved, and incorporate the work of prominent artists also involved the State Capital building.

It should be noted that the Alliance accepted the donation of an easement on the principal interior rooms of a private residence in Society Hill due to their historic character even though these rooms are not customarily accessible to the public.

These examples suggest that there are likely to be some private residential interiors in Philadelphia that would meet the criteria for designation.

5. Interiors as the Most Notable Feature

Designations in Washington, DC, imply that an interior might be designated when it is the most notable feature of a building, even if the building itself might not be historically designated. Five buildings or structures in Philadelphia contain interiors that might be considered the most notable feature of the building. However, in four cases, the buildings themselves are notable and thus the interiors do not stand-alone.

The *Reading Terminal Train Shed* (1891-93) would qualify as an interior that is the most notable feature of its structure. The interior space is the only functional element of the train shed and so the interior is in fact the only feature of the building. However, the shed itself has historic significance as a structure, being the only surviving single-span arched shed in the country. The interior is open to the public in its current use as the Pennsylvania Convention Center.

It is also possible that the *Reading Terminal Market* beneath the shed could be considered an interior space that is the most notable feature of this part of the structure. Like the Eastern Market in Washington, DC, the Reading Terminal market has served as public

market for the city in its current location and form for one and forty-six years. The market is open to the public.

30th Street Station (1929-34) is another building whose interior is its most notable feature. While there are subsidiary rooms and office spaces, the grand high-ceiled waiting room and is the primary interior function of the building. This interior space has been restored and is well preserved in its original form. The interior is open to the public. Again, the building itself has historic significance.

The *Grand Court of the John Wanamaker Store* is another interior that might be considered the most notable feature of its building. The Grand court rises five floors within the center of the building and contains the Wanamaker organ. The interior is open to the public. Once again, the building itself has significance beyond the interior. The Wanamaker Building also contains the Crystal Tea Room, an elegant interior space that is publicly accessible. However, interior designation of this room might be more problematic since it is not linked to the exterior. (The same might be said of the Corinthian Room in the Strawbridge and Clothier building.)

The *Masonic Temple* (1890s) might also be considered as a building whose interiors are its most notable feature. The seven lodge halls are lavishly decorated in different styles. All the interiors were designed by George Herzog. Once again, the building itself also has significance.

One other interior that might be cited as the most notable feature of its building is the *Boyd Theater* (1929) on Chestnut Street. The exterior façade of the Boyd on Chestnut Street is narrow and has a limited public presence and architectural expression. This and the remaining exterior facades—which are essentially blank walls—were not considered of enough significance, even with the historic association of the theater with the social and cultural history of the city, for the Historical Commission to designate the building in 2002. The true significance of the theater is its art deco auditorium, lobbies and other public spaces. Thus, the building’s interior, which is customarily open to the public as a requirement of business, is clearly its most notable feature.

However, designation of the interior of the Boyd Theater would raise the question of whether an interior has to be intact in order to be designated, as has been the case with interiors in other cities. In the 1980s, when the first designation of the Boyd (Sameric) was made, the interior was in good condition. However, now the interior is in poor condition and could not be classified as “intact.” However, most of the interior features remain in a condition that would allow for accurate restoration. The criteria for designations of interiors in other cities raise the question of whether the Boyd Theater would have to be restored before being eligible for designation. On the other hand, Philadelphia has designated buildings that are vacant and in poor condition, but that retain sufficient integrity so as to be capable of accurate restoration or rehabilitation. It is possible that the same practice might apply to interior designations.

6. Public Buildings

Some cities limit designation of interiors to public buildings for which a requirement of public access is clearly met. There are a number of public buildings in Philadelphia with exceptional interiors. *City Hall* has some of the finest interior rooms of any building in Philadelphia. *The Free Library, Family Court Building and Philadelphia Museum of Art* all have exceptional interiors. City owned buildings in neighborhoods, such as the twenty-two *Carnegie Libraries*, also have distinguished historic interiors.

Not all of publicly owned historic buildings are designated and so not all come under the jurisdiction of the Historical Commission as buildings, let alone as interiors. However, these buildings and their interiors are protected by the City Charter requirement that alteration of all City owned buildings or alterations using City funds (both interior and exterior) be reviewed the Art Commission. Thus, the designation of interiors of City-owned buildings would not seem necessary.

Other public buildings include those owned by the School District. There are many historic schools included in the National Register Schools District. Undoubtedly many of these have distinctive interior lobbies and other public spaces such as auditoriums, some of which might meet the criteria for interior designation. A notable of example of a building with distinguished interiors is the *Board of Education Administration building* on the Parkway, which has now been sold to a private developer without any protection of the historic interior spaces.

7. Religious buildings

Religious buildings present a special issue with respect to historic designation, not only for interiors but also for the buildings themselves. In many cities and states churches have contended that the separation of church and state should allow churches to be exempt for historic designation in general. Churches have been even more sensitive to the issue of interior designation that would preclude changes necessary for changing liturgy (movement of the altar to a new position) or which would prevent the removal of religious objects and iconography when the buildings are sold. While many churches have been given historic designation in Philadelphia (exterior only). The designation of Our Lady of Loretto in 2004 was challenged by the Catholic Archdiocese because it would prevent the removal of religious elements of the exterior, including stained glass windows, when the building was sold. However, the designation of the church was recently upheld on appeal to Common Pleas Court. While the case of the *Society of Jesus v. City of Boston* would argue that interior designation of churches is too restrictive, the Our Lady of Loretto decision might give strength to some level of interior designation for religious buildings in Philadelphia.

There are some religious buildings whose interiors are such an essential part of the historic significance of the building as a whole that interior designation would seem justified. For example:

- *Church of St James the Less* (1846-49): Based on drawings from a 13th century parish church in England, it is most authentic Gothic Revival Church in the city and was a national model. Many interior details were made in England.
- *St. Marks Church* (1848-51): Designed by John Notman in the medieval Gothic Revival, style, the interior is distinguished by materials left in their natural condition as was typical of medieval churches.
- *Church of Gesu* (1879-81): Modeled after the Gesu in Rome, the barrel-vaulted nave was once the widest in the country. The rich interior was designed by prominent Philadelphia church architect Edwin Durang.
- *Christ Church* (1727-44): Reported to be the most sumptuous building in the colonies, the interior is an outstanding example of Georgian design. The church has direct association in persons of the colonial era.
- *Arch Street Meetinghouse* (1803-1811): The west meeting room retains its original form, indicative of both the architecture and religious practices of early Friends. A unique example of Quaker religious architecture.
- *Congregation Rodeph Shalom* (1927): The oldest Ashkenazic congregation in the country, the sumptuous interiors are covered with geometric designs by the D'Ascenzio Studio.

8. Cultural and Educational Institutions

Cultural and educational institutions occupy many historic buildings that contain distinctive interiors. They are regularly open to the public; many of the interiors are extensions of the exterior architectural character and were designed by notable architects. These interiors would also seem to qualify for designation by the criteria used in other cities.

Some obvious examples are:

- *Drexel University Main Building* (1889-91): The central interior courtyard is one of the finest interior spaces and might qualify as the most notable feature of the building, were it not for the distinguished architecture overall, important architect and association with an important person
- *Irvine Auditorium*, University of Pennsylvania (1928): A distinguished interior designed by Horace Trumbauer, integral to the architecture of the building, and later renovated by Robert Venturi.
- *Pennsylvania Academy of Fine Arts* (1872-76): The lobby, main stair, and second floor gallery areas adjacent to the main stair of the Academy are exceptional features of the building and outstanding examples of the work of Frank Furness. While it might be expected that no one would tamper with a Furness interior of this significance, there was considerable public concern when the Academy proposed to alter the stair and an adjacent room. This is a good example of why even interiors that seem well protected might benefit from interior designation to insure protection and appropriate public review of alterations.

- *Fisher Fine Arts Library* (1888-90): The library is one of the best examples of the work of Frank Furness. The integration of exterior and interior design is outstanding.
- *Paul Peck Center, Drexel University, formerly Centennial Bank* (1876). Also designed by Frank Furness, the interior has been well restored and contains many of the original features and the character of the original design.

(A case could be made that the interiors of almost all buildings designed by Frank Furness, much like the interiors of Greene and Greene in Pasadena, are worthy of designation given both Furness's importance as an architect in Philadelphia and the very strong relationship between interior and exterior that is characteristic of his architecture.)

9. Theaters

Interior designation in other cities makes it clear that theaters meet the requirement for public access and are appropriate for interior designation when there is a direct relationship between interior and exterior architecture, and when they have other factors related to the social and cultural history of the city. Several theaters would appear to fit these criteria.

- The *Boyd Theater* (1929), previously discussed as an interior that is the notable feature of its building, would also meet the criteria for theaters in general. The building contained many innovations for its time and was a social and cultural landmark in the city.
- *Academy of Music* (1855-57) auditorium and lobby are exceptional interiors; have an important place in the social and cultural history of the city; are publicly accessible and intact.
- *AVA Opera* might be considered under the category of educational/ cultural facilities or as a theater. The first floor of the building functions, as a theater is open to the public and has distinctive interiors, including a room designed by Frank Furness. The interior is unique in that it combines a fine townhouse of the period with an intimate private theater built by the original owners.

10. Office Buildings

Office building interiors are similar to those of apartments and hotels. It is generally the lobby spaces that have special architectural character and are open to the public. Many historic office buildings have lobbies that are an extension of the exterior architecture and are linked to the exterior by direct relationships with the main doorways to the buildings, similar to criteria used in other cities for banking institutions. A few examples include:

- The Atlantic Building: The Art Deco lobby is a distinctive feature of the building and protected by an interior easement.
- 1616 Walnut Street; Also a fine Art Deco building with an Art Deco lobby in its original intact condition.

11. Small Commercial Buildings

The loss of the interiors of smaller commercial buildings is one of the issues that have led to an interest in adding interior designation to the Philadelphia ordinance. These buildings are customarily open to the public as a result of the function of the building and many had or have interiors that were integral with the exterior architectural expression. Many have been lost or altered and therefore raise the issue noted in the discussion of the Boyd Theater of whether they would qualify for interior designation in their current condition.

- *Jacob Reeds Sons Store* (1903-04) The store had an exceptional interior space that was integral to the architecture of the building. It was an outstanding example of work by the influential architect William Price.
- *Jack Kellmer Jewelry*: Modified by Paul Cret from a Wilson Hale building, the interior is a single barrel-vaulted space. It is currently in the condition of Cret's modification of the building. Although the interior space is grand, there may be some question about it meeting designation criteria. The interior retains much of the character of the original building, while the exterior has been greatly modified by Cret in a manner that is not necessarily extended on the interior.
- *J. E. Caldwell's Jewelry Store*: The interior was designed by Horace Trumbauer in 1916 and until 2006 remained intact in its original condition right down to the Trumbauer-designed display cases. It was open to the public. However, designation criteria in other cities, as has been noted in discussion of examples in Philadelphia, places considerable emphasis on the integration of interior and exterior architectural design. Here the interiors was created later and independent of the building and could be considered an applied decoration not integral with the building itself. Notwithstanding its fine design, the criteria used in other cities might not support the designation of the Caldwell's interior.

12. Designation of Interior features

In addition to complete interiors, ordinances in other cities allow for the designation of interior features. Interior features are architectural elements that are fixed in place and part of the design of a space and have importance although the total space itself does not meet the criteria for designation. Some possible examples of interior features in Philadelphia might include:

- *Murals and elevators in Strawbridge and Clothiers*: The main floor elevator lobby contains a series of Art Deco murals above the elevator doors depicting historic events from Philadelphia's 19th century history. The metal elevator doors are elaborately designed with floral motifs and silver and bronze details. (A nomination of the murals and elevator doors as historic objects has been submitted to the Historical Commission.)

- *Doges Ceiling in the Fell-van Rensselear House*, now Anthropologie: Much of the original interior is now gone but one room contains a ceiling covered with portrait medallions of the Popes commissioned by the original owner.
- *Dream Garden Mural*, Curtis Center: It is possible that the Dream Garden mural might qualify as an interior feature more than as an “object” (as it was designated by the Historical Commission in an effort to protect it) based on the supposition that it would be destroyed if it were moved.

Conclusion

This discussion of building types indicates that there are a wealth of historic interiors in Philadelphia. The examples presented suggest that there are many that would meet the criteria used for historic designation of interiors in other cities. However, it is also interesting to note that a rigorous application of the criteria used in other cities might not support the designation of interiors that have been of recent concern, like the Boyd Theater, the Corinthian Room at Strawbridge’s and the J.E. Caldwell’s store.

B. ORDINANCE CHANGES

This section of the report examines the changes that would have to be made in the City’s Historic Preservation ordinance to include interior designation.

1. Policy Questions

Before determining what changes would need to be made in the Ordinance, there are several policy questions that would need to be addressed concerning how broad to make the authority to designate interiors. The four principal policy questions are:

- Would interior designation be limited to spaces that are accessible to the public or to which the public is customarily invited (whether free or by payment) or would designation be more broadly defined to include interiors not accessible to the public, including private residences?
- Would criteria for designation be the intact status of the historic interior?
- Could an interior designation be made based on only one of the criteria listed for designation (as is now the case for designation of historic buildings)?
- Would the designation of interior features be allowed, in addition to the designation of entire interior spaces?

For the purposes of examining the ordinance, we have assumed that the broadest approach to interior designation would be taken and have indicated the types of changes necessary to accommodate such an approach. However, the places where a narrower approach to the above questions would be reflected have also been noted.

2. Changes to the Ordinance

a. Title and Purpose:

Section 14, 2007 of the Philadelphia code is entitled “Historic Buildings, Structures, Sites, Objects and Districts, and Section 1, the Declaration of public policy and purposes, repeats this same phrase in various sections (Subsection 1(a), 1(b)(.1, .3, .4,). In view of the fact that the Pennsylvania Supreme Court denied designation on the Sameric/ Boyd Theater on the grounds that interiors were not explicitly indicated in the City’s ordinance, the word “interiors” would have to be added to the title and the policy and purposes section. In addition, if the objective of modifying the ordinance is to provide a range of options regarding interior designation that would include “interior features” this would also have to be added to the title and sub-sections. If a narrower definition of interior designation were adopted the phrase “interior features” might not be added here.

The phrase “buildings, structures, sites, objects and districts” occurs throughout the ordinance. The change made in this section would be repeated wherever that phrase is used in other sections of the Ordinance. (For example, Subsection 4(a, c, d, f); 5; and elsewhere.)

Change: Add “Interiors and Interior features” to the title, statement of purpose and other sections.

b. Definitions

Two new definitions would need to be added to Section 2: a definition of interiors and one of interior features, inserted in alphabetical order. A broad approach to interior designation would simply define what interiors are—rooms, hallways and other spaces within a building. A narrower approach might limit these to such rooms, hallways and other spaces that are accessible to the public or to which the public is customarily invited in the natural course of operation of the building and interior. Interior features suitable for designation would be defined if included in the title and purpose of the ordinance. The language used in Oak Park to define interiors and interior features provides a good precedent.

Change: Definition of Interiors—Rooms, hallways, and other spaces within a building or structure that shelter any form of human activity.

Change: Definition of Interior features—Architectural features within a building of functional, aesthetic, cultural, historic or scientific value that may be integral to an interior and related to the setting or environment.

c. Criteria for Designation

The criteria for designation of interiors that emerges from the analysis of other cities includes the following:

- Has significant character or value as part of the development, heritage or cultural characteristics of the City, state, or Nation;
- Is associated with the life of a significant person in the past;
- Embodies the distinguishing characteristics of an architectural style;
- Is the work of a designer, architect or engineer of significance;
- Contains elements of design, detail, materials or craftsmanship which represent significant innovation;
- Retains the distinguishing architectural features of its original design;
- Is an extension and enhancement of the architectural character of the exterior of the building and is related to the exterior in a direct manner;
- Is accessible or visible to the public or to which the public is customarily invited in the natural course of operation of the building.

This list of criteria includes all but five of the criteria listed for designation of buildings, structures, sites and objects in sub-section 5 of the Philadelphia Ordinance, and adds three criteria not listed in the ordinance (listed last above). The five additional criteria in the Ordinance make reference to important events (5-b), the environment (5-c), part of or related to a square or park (5-g), familiar visual feature (5-h), information regarding pre-history or history (5-i). Of these the first—associated with an event of importance—could easily be a criteria for designation of an interior. The interior of Independence Hall, for example, would clearly qualify for designation based solely on the events that took place within the building. All of the other criteria do not seem applicable to interior spaces.

The three criteria not listed in the ordinance (the last three listed above) reflect policy issues about the scope of interior designation, which could or could not be added to the criteria depending on how broad or narrow a policy on interior designation is desired.

In Philadelphia historic designation of a building, structure, site or object requires that only one of the criteria listed in Section 5 of the ordinance be met. However, it should be noted that the paper on Washington DC designation practices and interior designations in other cities suggest that more than one criterion is often required. For example, if public access is stated as one of the criteria (as opposed to being included initially in the definition of interiors) that have to be met as well as one of the other criteria listed. In many cities architectural significance is an essential requirement of historic designation. Designation, as allowed in Philadelphia, solely on association with an individual of importance, is not always allowed in other city's ordinances. In the case of interior designation in Philadelphia it would be worth reviewing whether only one criteria need be met and whether, for example, interior designation is justified solely on the basis that

someone important—not necessarily the commissioning resident—lived in the property.

Change: No change in criteria.

d. Permits

Section 7(b) requires the posting of a notice when a person applies for a permit to demolish an historic building. (The Historical Commission is considering a change that would require posting of some kind for permits for alterations as well.) This requirement would also apply to permits for the demolition of an historic interior. Posting on the exterior of the building, as currently required, would seem appropriate in the case of designated interiors.

Change: No change.

e. Financial Hardship, Public Interest and Ability to Adapt

It is conceivable that a property owner may claim that it is not feasible to retain a designated interior in its designated form. Since these are interior spaces, the issue is likely to be an inability to rent or an inability or need to adapt the interior for contemporary use. Section 7(f)(.3) addresses the type of information that would be needed to evaluate the inability to adapt or the economic infeasibility of use of an interior space and Section 7(f)(.5) addresses the issue of the inability to lease. Section 7(j) defines standards for demonstrating that a building cannot be adapted for another use, which would also seem to be equally applicable to interiors. These sections would appear to be equally applicable requirements for permits for demolition (or alteration) of interiors as for a building as a whole.

The meaning of “necessary in the public interest” is not defined in the ordinance. However, it is conceivable that an the alteration or demolition of an interior might fit an appropriate definition of “necessary to the public interest.” For example, the alteration of the interior of the Reading Terminal Train Shed for the Pennsylvania Convention Center might have fit such a definition. Consequently, this criteria might be considered acceptable for interiors as well as designated buildings.

Change: No change.

f. Performance of work or maintenance

Section 8-c limits the interiors of historic buildings that must be kept in good repair to those interiors that might cause the exterior to deteriorate. While this requirement should be maintained, any interior that has been designated as historic should be required to be kept in good repair.

Change: Add interior and interior features to the list of building, structure, and object.

PART THREE: CONCLUSIONS AND RECOMMENDATIONS

A. WHAT TYPES OF INTERIORS NEED PROTECTION?

Although Part Two of the report demonstrates that there are a large number of interiors in Philadelphia that might qualify for interior designation and have the characteristics worthy of historic designation, not all interiors may need protection. Nor can the City designate every interior of interest any more than it can designate every building of historic significance in the city. Philadelphia is too rich in historic resources,

It is of course conceivable that exceptional interiors that seem unlikely to be altered could in fact be altered by changes in building use or the need to adapt to contemporary needs. The idea that someone would fill in the Grand Court of the Wanamaker Building with floors and eliminate the great interior space seems inconceivable. But the inability to find a department store or other use to occupy and support this grand space might, in the future, could, theoretically, lead to such a proposal. The proposal to alter the main stair and adjacent room in the Pennsylvania Academy of Fine Arts is a reminder that even exceptional interiors can be subject to alteration.

However, practically speaking many of these grand spaces are protected either by their inherent economic value to the building they are in, by their function or ownership, or by restrictions placed by National Register listing or other factors. A limited number of interiors are protected by covenants or easements, a device that could be applied more extensively to interiors in lieu of historic designation, with the added benefit that the donation of easements might provide a charitable tax deduction for the property owners.

In recent years three categories of interiors have seemed more vulnerable than others and therefore more in need of protection:

- Small commercial buildings;
- Religious buildings undergoing adaptation or sale;
- Public buildings no longer needed for public use and being sold for private use.

Part Two includes examples of small commercial buildings that have been or might be subject to interior alteration including the Jacob Reed Store (now a drug store), the Old PSFS bank building at 7th and Walnut (soon to be a restaurant), the former Provident Bank interior at 17th and Chestnut (another drug store), the J.E. Caldwell's Jewelry Store (soon to be a restaurant). Undoubtedly a broader than Center City examination of smaller commercial building interiors lost or in danger would produce other examples.

An example of religious buildings where interiors have been lost is the Episcopal Cathedral. Many other churches that have been closed and the condition and fate of their interiors is uncertain. In some cases it is known that interior elements have been removed and sold or relocated, especially stained glass windows. The recent removal for sale of a

Saint-Gauden's sculpture by St. Stephens Church is a reminder that even functioning churches may be tempted to sell interior items to sustain operations. One important religious interior currently in danger is that of the Church of St. James the Less, which has lost its congregation and is presently unused.

A number of public buildings have been declared surplus and made available for sale or have been sold to private parties. The City of Philadelphia has turned over to PIDC for marketing and sale three historically designated buildings: the Mercantile Library, the Delaware Avenue Pumping Station and the Germantown Town Hall. The Germantown Town Hall contains an important interior space within the curved portion of the building that has no protection from alteration by a private developer. Another example, noted in Part Two, is the Board of Education Administration Building, which has already been sold to a private developer without protection of its many historic interior spaces.

In addition, a case could also be made that the "modernization" and upgrading of older office buildings or apartment buildings, or the conversion of office buildings or apartment buildings to condominiums, may lead historic lobbies, hallways, or public spaces to be demolished or significantly altered to produce spaces thought to be more appealing to current buyers or tenants.

These examples suggest that if interior designation were added to the Philadelphia ordinance it might be best to focus on interior designation of these types of spaces rather than focusing exclusively on the more obvious landmark interior spaces that may not be in need of protection from inappropriate alteration or demolition.

B. CONCLUSIONS AND RECOMMENDATIONS

1. Conclusions

The survey of other cities and our court decisions provides ample evidence that designation of historic interiors is practiced by many other cities and has withstood legal challenges. The number of interiors that have been designated is extensive and the range is broad, including both interiors that are easily accessible to the public and ones that are not publicly accessible at all. This suggests that there is no reason why the designation of historic interiors could not be added to Philadelphia's historic preservation ordinance. Indeed, the extensive practice in other cities as well as the number of significant interiors identified in Part Two of this report suggest that interior designation should be added to the ordinance.

Prior to adding the authority to designate interiors to the ordinance there are a few key policy questions that would need to be addressed. The most important question is whether designation would be limited to only those interiors that are publicly accessible. A second question is whether to include interior features as well as entire interiors. Once these questions are decided, the changes to the ordinance necessary to include interior designation are not complex.

It is the view of the Preservation Alliance that the authority to designate and protect historic interiors should be included in the Philadelphia historic preservation ordinance, and that such authority should be broadly described, allowing for the designation of both publicly accessible and non-accessible spaces and the designation of interior features as well as entire interiors.

2. Recommended Next Steps

This report is intended to serve as a basis for discussion about whether to amend Philadelphia's historic preservation ordinance to include the designation of historic interiors. To foster that discussion the Preservation Alliance proposes to undertake the following:

- The Preservation Alliance will distribute copies of this report to other preservation organizations including the Historic Preservation Committee of AIA Philadelphia, to the Philadelphia Historical Commission, and to the Mayor and City Council members.
- The Alliance will hold a public forum to discuss the findings of the report, to hear comments, and assess public interest and support for amending the ordinance.
- The Alliance will distribute copies of the report to owners of properties that include interiors that might be designated and assess the questions and concerns raised by property owners.
- The Alliance will incorporate the information obtained from the above into a summary report and submit that to the Mayor and City Council with our final recommendation regarding amending the ordinance.

The Preservation Alliance welcomes comments concerning the findings in this report and the general conclusions we have drawn from the information summarized in the report.

APPENDIX A

Designation of Historic Interiors, National Survey of Current Practices, prepared for the Preservation Alliance of Greater Philadelphia by Lori Salganicoff, 2006

DESIGNATION OF HISTORIC INTERIORS National Survey of Current Practices

Prepared by Lori Salganicoff, Preservation Planner

SURVEY SUMMARY

The summary in table 1 is arranged alphabetically by state, describing the ordinances and practices of cities with provisions for designation of interior landmark spaces and features. This list is relatively comprehensive, although there are likely additional Certified Local Governments designating interior landmarks in states such as California and North Carolina, where the state enabling legislation specifically allows it.

SURVEY DETAIL

1. City of Long Beach, CA

Ordinance: A building may be designated an historic landmark if it has historic and/or architectural value and has retained its original exterior form and materials. An ordinance is created for each designated landmark that states which elements must be preserved. This approach is supported by California's Mills Act, which offers generous rehabilitation tax credits for appropriate work on elements identified as significant in landmark ordinances for designated properties.

The City of Long Beach is currently reworking its preservation ordinance; one of things being added is the ability to specifically designate interior public spaces of publicly owned buildings. The interiors issue is not the primary reason for this rewrite as there are issues considered to be more pressing relating to structure of the commission and the Certification of Appropriateness process, staff vs. Commission review, and a refinement of currently vague designation criteria to better parallel national and state criteria.

Resources Designated: The City of Long Beach, CA designates historic interiors as part of their landmark designations, i.e. the City has not designated interiors as stand-alone historic spaces, but protects character-defining features within interiors as well as exteriors. Long Beach currently has **122 historic landmark buildings and some districts, however the number of resources with designated interior features is unknown.**

Ownership and Access: Public access is not required, and privately owned building may be designated. Owner consent is not required.

Political or Legal Challenges and Climate: Preservation Department staff presented their suggested ordinance changes to city council with the below referenced PowerPoint presentation, council members unanimously supported the changes. The City of Long Beach also enjoys the strong support of a very active preservation community.

Additional Incentives: Mills Act (state tax credit) Property Contracts allow all CLGs to participate in the regulation of interiors. Environmental rules (CEQA) encourage CLGs to consider entire resource rather than just exterior facades.

Table 1

City	Interior Designations in Ordinance	Interior Landmarks or Features	Public Access Required	Private Interiors Designated	Owner Consent Required
Long Beach, CA	No	Features	No	Yes	No
Los Angeles, CA	No	Features	No	Yes	No
Pasadena, CA	Yes	Landmarks & Features	No	Yes	No
San Francisco, CA	Yes	Landmarks & Features	Yes	No	No, seek it anyway
Telluride, CO	Yes	Landmarks	No, but required in practice	No	No, seek it anyway
Coral Gables, FL	Yes	Landmarks & Features	No, but required in practice	Yes, owner request	No, seek it anyway
Delray Beach, FL	No	Landmarks	Not known	Not known	Yes
Chicago, IL	No	Landmarks & Features	Yes	Yes	No, seek it anyway
Oak Park, IL	Yes	Landmarks & Features	Yes	No	No, seek it anyway
Boston, MA	Yes	Landmarks & Features	Yes	Yes, if accessible	No
Detroit, MI	Yes	Features	Yes	No	Yes
Ashville NC	Yes	Features	No	Yes	Yes
Charlotte, NC	Yes	Features	No	Yes	Yes
New York, NY	Yes	Landmarks	Yes	Yes	No
City of Rochester, NY	Yes	Landmarks	Yes	Yes	Yes
Portland, OR	Yes	Landmarks & Features	Yes	Yes	Yes
City of El Paso, TX	Yes	Landmarks	Yes	Yes	Yes
Seattle, WA	No	Features	No	Yes	No
Tacoma, WA	No	Features	No	Yes	No, seek it anyway
Washington DC	Yes	Landmarks & Features	No	Yes	No, seek it anyway

Online documentation location: Historic Preservation Department:
<http://www.longbeach.gov/plan/pb/hpd/default.asp> Each landmark ordinance located within Chapter 16.52. PowerPoint/video from City Council meeting -- good example of reworking ordinance process
http://longbeach.granicus.com/ViewPublisher.php?view_id=12

Contact Info: Shaine Klima, Preservation Aid: 562-570-6864
Jan Ostashay, Preservation Officer: Jan_Ostashay@longbeach.gov

2. Los Angeles, CA

Ordinance: The Los Angeles Historic Preservation Overlay Zones Ordinance was adopted in 1962. When designating a property, the Cultural Heritage Commission typically considers the entirety of the resource – exteriors, interiors, and landscape features such as rocks and major plant life.

Resources Designated: Los Angeles has **835 individually designated local “monuments”** (buildings, sites, structures, trees, rocks). The majority of designated sites include entire properties. Also single-family residential interiors, exteriors, trees major plant life. 25 Historic Districts. Districts only cover exterior, some look at landscape features.

Ownership and Access: Designated “monuments” can include residential interiors. One recently approved designation was controversial politically as it protects only those elements visible from a public right of way.

Political or Legal Challenges and Climate: Owners have challenged a few designations due to processes not being followed (1 won). There have been no other legal challenges in staff recent memory. People sometimes make alterations out of sight and without permit; this is especially a problem with rehabilitation work on privately owned designated buildings with designated interiors.

The Los Angeles Conservancy is able to vet many preservation issues in the public, and works to ensure that public reaction is positive. Preservation is part of the culture of the place. In addition, the Commission enjoys a very good relationship with the code enforcement staff that works out of Dept of Building and Safety.

The preservation climate might be different in CA because of environmental rules (CEQA) that encourage and enforce looking at the totality of resources. In addition, there is a California version of Section 106 for state-funded projects.

Online documentation location: Historic Preservation Division, Los Angeles Department of City Planning: <http://cityplanning.lacity.org/>

Contact Info: Lambert Giessinger; (213) 978-1200; Cultural Heritage Commission

3. Pasadena, CA

Ordinance: The historic preservation ordinance in Pasadena states that “a historic monument designation may include significant public or semi-public interior spaces and

features.” However, Pasadena has so far only designated interiors of structures designed by Greene and Greene; these are designated as “Monuments.”

The protection of the Greene and Greene interiors is a result of City Council action in response to the destruction of the interior of Greene and Greene’s Blacker mansion. Pasadena has found that the difficulty in designating interiors is documenting the integrity of the original design. This is easier with Greene and Greene and some of the other architect-designed Craftsman houses.

The Cal Tech campus contains several buildings with architecturally significant interiors, but the University “does not want the City’s hands inside” and think they are better stewards, so Pasadena has not taken action to designate these properties. Stick Auditorium, City Hall others, have intact interiors that are not designated. However, all of these are reviewed by the design commission and/or the historical commission (depending on the location) for advisory review for city owned properties (any building, regardless of the age must be reviewed, written into municipal code).

Resources Designated: 110 Greene and Greene buildings have been designated Historic Monuments. The buildings are described and protected inside and out.

Ownership and Access: For buildings not in the original Greene and Greene wave of designation, the Planning Department waits for property owners to come forward and volunteer interiors of houses for designated. Most of their historically important houses have been renovated.

Political or Legal Challenges and Climate: After the Blacker House controversy, anyone that has a Greene & Greene property is policed by the community. Pasadena can also regulate non-designated interiors is through the Mills Act – states tax credit. Advisory review carries weight because there is a great deal of public support and activity.

Online documentation location:

<http://www.ci.pasadena.ca.us/planning/deptorg/dhp/homedhp2.asp>

Contact Info: Robert Avilar, Associate Planner, City of Pasadena Planning Dept 626-744-4009

4. San Francisco, CA

Ordinance: Article 10 of the San Francisco Planning Code allows the city to designate interior features: “... for a publicly owned landmark, review of proposed changes in major interior features.” It also allows for the designation of “significant public and quasi-public interior spaces.”

Resources Designated: Depending on the resource, San Francisco may designate entire significant interior spaces or they may identify specific interior features as significant. Each landmark’s ordinance will specify the controls on that property. San Francisco has **12 interiors designated, approximately 250 total individual landmarks** plus districts. Advisory Board staff has found itself reviewing publicly accessible interiors of other

landmark buildings, even when those interiors are not specifically designated. This is currently being refined.

Ownership and Access: Although the ordinance allows for the designation of “quasi-public” interior spaces, this has been interpreted to exclude interiors of privately owned structures. However, if a public property is sold to a private concern, the existing designation stands. This may be challenged soon, as the San Francisco City College was designated a few years ago and recently sold to a private individual who might convert it into a nightclub/restaurant.

Political or Legal Challenges and Climate: The Advisory Board has not experienced enforcement problems so far, but anticipate possible problems with St. Bridgids Church. The Church has been sold, but former parishioners are seeking its designation. 1032 Broadway is another significant cultural 19th Century interior because there were important “salons” there. As a privately owned building it has been designated a landmark, but the interior is not included in the designation. However, under California Environmental Qualities Act, (like a state 106) San Francisco determined that the interior is historically significant and subject to review. That is currently being challenged, and will probably go to the Supreme Court.

Online documentation location:

<http://www.sfgov.org/site/uploadedfiles/planning/preservation/PresBulletin01LPABPRO C.PDF>

Contact Info: Mark Luellen, Preservation Coordinator, 415-558-6478; Neil Hart, 415-558-6338; Landmarks Preservation Advisory Board

5. Telluride, CO

Ordinance: The 1980 “Historic Preservation Overlay District” ordinance has allowed for the designation of interiors for at least 10 years, and may have included interiors from its conception. Colorado’s state enabling legislation is silent on interiors, and requires that CLG’s simply create “historic preservation regulations.”

The same designation procedure exists for interior as for exterior with minor differences – an exterior designation requires a supermajority of the Historic Architecture Review Commission (HARC), while a simple majority is sufficient to approve an interior designation.

Resources Designated: Telluride currently **4 has interior landmarks** – County Courthouse, Sheridan Opera House, Sheridan Hotel, and the Museum (formerly a hospital). **The town has a national historic district with 300 buildings**, half of these are rated as contributing to the district. All 4 of landmark interiors are within this district. There has been some discussion of designating other building interiors.

Ownership and Access: For any designation, the owner has the opportunity to object, but the HARC can still designate over owners’ objection. The ordinance doesn’t expressly indicate a public accessibility, but in practice there is a preference for properties to be open to the public on a regular basis. The Sheridan Hotel and Opera House are private but open

to the public. Telluride has just approved an easement on part of an interior of a private bank building that specifies how much time the building must be publicly accessible. This requirement stems from the requirements of a federal grant through the National Park Service.

Political or Legal Challenges and Climate: The staffs of the Sheridan Hotel and the Sheridan Opera house are very proud to have landmark interiors. There are no enforcement differences between interior and exterior landmarks; both are considered “unusually strong regulations for a mountain state, but that’s how people feel about all designated buildings.”

Online documentation location: Historic Preservation overlay district ordinance: <http://www.town.telluride.co.us/landuse/art7div1.html>

Contact Info: Michael Davenport, Historic Preservation Planner, mdavenport@telluride-co.gov; 970-728-3071

6. Coral Gables, FL

Ordinance: Local interior designation is not dictated by State Enabling Legislation, which doesn’t mention interiors. Interior designation has been considered to be a part of the Coral Gables Historic Preservation ordinance since it was created in 1978, but interiors are not specifically mentioned. An Historic Landmark Designation Report is prepared for each landmark property and district identifying individual properties, improvements, landscape features, or archaeological sites.

Resources Designated: Interior spaces are not typically subject to regulation; however, in cases of existing structures having exceptional architectural, artistic, or historical importance, interior spaces that are customarily open to the public may be specifically designated. Coral Gables can but have not designated privately owned properties. The designation report prepared for each landmark describes interior features subject to review as well as requirements for their treatment.

The city has over 600 landmarked buildings and a **handful of interiors**, primarily public buildings and churches. The only non-public building is a portion of the Collonade Hotel, which was formerly owned by the city’s founder. Most are individually designated. The Biltmore Hotel, owned by the City, is one example of a landmark with a designated interior.

Ownership and Access: Non-publicly owned interior features are not typically designated. Designation of privately owned properties must be requested by the owner and/or with public or commercial, publicly accessible spaces.

Political or Legal Challenges and Climate: **Although** several of the designated interiors are within Churches, the Churches have apparently “not bothered to worry about it.” This may be partly because of active and committed preservation support in the community.

Online documentation location: Not available.

Contact Info: Simone Chin, Coral Gables Historic Resources Department (305) 460-5094

7. City of Delray Beach, FL

Ordinance: The Florida State Enabling Legislation doesn't mention the designation of historic interiors. The local ordinance that created the CLG in 1988 always offered interior designation

The ordinance states that: "A building, structure, site, or district is deemed to have architectural or aesthetic significance if it fulfills one or more of the following criteria; except that to qualify as a historic interior, the interior must meet the criteria contained within divisions (b) and (d):

- (a) Portrays the environment in an era of history characterized by one or more distinctive architectural styles;
- (b) Embodies those distinguishing characteristics of an architectural style, period, or method of construction;
- (c) Is a historic or outstanding work of a prominent architect, designer, landscape architect, or builder; or
- (d) Contains elements of design, detail, material, or craftsmanship of outstanding quality or which represented, in its time, a significant innovation or adaptation to the South Florida environment."

Resources Designated: Staff thinks that there might be interiors and interior features listed as part of an overall landmark report.

Ownership and Access: Staff not sure if designated buildings are strictly publicly accessible.

Contact Info: Amy Alvarez, Historic Preservation Planner: 561-243-7284

Online documentation location:

<http://mydelraybeach.com/NR/rdonlyres/ebwzzilfwju4jybrksqm3lg4ukybidcv45lhkwd3kox4qkrsuf54lontqme4tcm7n362ri6avffh2onha5prqas6w3d/Article+4%2e5.pdf>

8. Chicago, IL

Ordinance: The Commission on Chicago Landmarks was established in 1968 by [City Ordinance](#). It is responsible for recommending to the City Council that individual buildings, sites, objects, or entire districts be designated as Chicago Landmarks, thereby providing legal protection. The Landmarks Ordinance allows for designation of "such areas, districts, places, buildings, structures, works of art, and other objects having a special historical, community, architectural, or aesthetic interest or value to the City of Chicago and its Citizens." This does not specify, but implies, the inclusion of interiors.

Within districts, mostly exteriors and rooflines are designated. Landmarks are considered individually, and a determination is made as to whether any of interior spaces should be included. Each designation gets its own ordinance. Those with significant interior design/elements/space are designated, whether or not these are public spaces.

Resources Designated: As of February, 2006, 282 [Chicago Landmarks](#) have been designated by the City Council, **including 244 individual designations**, 38 landmark districts, and four district extensions, totaling 6,500 properties. Landmarks staff created the attached list for the purpose of this study, and discovered that **122 these properties include interior designations**. The city usually designates building exterior and if it's appropriate will also designate interiors. Buildings with designated interior landmarks and features include lobbies of commercial buildings and hotels.

Ownership and Access: Owner consent is advisory - not required - for designation. Where there is "non-consent/no response," a public hearing is required. Designated interiors are typically publicly accessible space such as lobbies, but not necessarily publicly owned. The question of public access has never been legally defined and is determined on a case-by-case basis. One owner's decision to limit access wouldn't deter the designation of an interior if it were sufficiently historic. Accessibility could range from completely available to open to the public once per year. Formerly accessible buildings such as the Rookery are open to the public in a restricted manner since September 11th.

Additional incentives: 10% County tax credit offered for substantial qualified revitalization

Contact Info: Matt Crawford 312-744-9146, matt.Crawford@cityofchicago.org ; Terry Tatum (designation) 312-744-9147 M; Dijana Cuvalo (permits), (312) 744-3200; landmarks@cityofchicago.org

Online documentation location:

www.CityofChicago.org/Landmarks/Tours/Interiors.html

Landmarks Ordinance:

<http://www.cityofchicago.org/Landmarks/pdf/LandmarksCriteria.html>; Designation process: <http://www.cityofchicago.org/Landmarks/pdf/DesignationProcess.html>

9. Oak Park, IL

Ordinance: The Historic Preservation Commission, established in 1972, evaluates proposals affecting the Village's landmarks and historic districts. 5 of the 22 landmarks in Oak Park have designated interiors and interior features.

Resources Designated: The Ordinance defines protected "Interior Architectural Features" as well as "Interior Historical Landmark":

- **INTERIOR ARCHITECTURAL FEATURES:** The architectural character and general composition of the interior of a structure, including the room design and configuration, color and texture of materials, and the type, pattern and character of all architectural details and elements, including, but not limited to, staircases, doors, hardware, moldings, trim, plaster work, light fixtures and wall coverings.
- **INTERIOR HISTORIC LANDMARK:** An interior, or part thereof, which is normally open or accessible to the public and which has a significant historical or aesthetic interest or value as part of the development, heritage or cultural characteristics of the Village, State of Illinois or United States and which has been designated as an interior landmark pursuant to the provisions of this Article.

Historic Landmarks and Interior Historic Landmarks are designated based on historical/cultural importance, architectural/engineering importance, etc., is 50 years old, and possessing sufficient integrity of location, design, materials and workmanship to make it worthy of preservation or restoration. However, the Village board can deny designation of any historic landmark, irrespective of whether or not the proposed landmark satisfies one or more of the above listed criteria.

5 of 22 landmarks have designated landmark interiors including Frank Lloyd Wright Home & Studio, Unity Temple, Ernest Hemingway Birthplace Home, and The Plaza Hotel (lobby/foyer area including: the four-story atrium with a turned spindle latticework stairway, the ornamental stained and beveled glass door surround between the foyer of the original building and the former dining area in the addition, and the two brick archways leading off from the foyer area).

Ownership and Access: Oak Park does not require owner consent, but typically seeks it.

Online documentation location: <http://www.oak-park.us/public/pdfs/Historic%20Preservation/07.20.04%20HP%20Ordinance.pdf>

Contact Info: Doug Kaarre; Community Planning and Development Department: 708.358.5417

10. Boston, MA

Ordinance: The 1975 Massachusetts enabling legislation that created the Boston Landmarks Commission allows for the designations of interior spaces and features, and may designate interior landmarks within the Historic Beacon Hill District or Back Bay Residential District. Every individual landmark has its own standards and criteria created. The Beacon Hill and Back Bay districts pre-date the enabling legislation.

There are two agencies that deal with historical properties and landmarks within the City of Boston. The [Historic Districts Commission](#) reviews property renovation in specific districts in order to maintain community character and preserve the historical nature of the area. The [Boston Landmarks Commission](#) and environment department is the City's preservation agency identifies historic buildings and places and protects them through landmark and district designations. The BLC manages design review in seven historic districts, reviews historic aspects of development projects and provides public information.

Resources Designated: 16-20 out of 80 landmarks have designated interiors; some are just interiors (a very large theater inserted into a building with another purpose – only the marquee is designated at the exterior). Some are part of lobbies in a couple commercial buildings, restaurant space, never the back of house or a kitchen. Old Federal Reserve Bank, Gibson House Museum (plumbing, lighting, features) in Back Bay (interior under separate legislation because exterior is part the district).

Every district is different – the Back Bay Historic District is equivalent to a landmarks district (Beacon Hill and Back Bay have their own legislation predating the enabling legislation from late 60s.) reviews everything exterior, even if not visible. Boston Public Library (very detailed designation review, including furniture), Faneuil Hall (three floors),

Olsen Depot (Train Station turned into a restaurant – only designated rafters, all else changed), Curley House (former Mayor’s House) now owned by the City accessible to public, pottery works and kiln, Federal Reserve Bank (offices, lobby, court; now a hotel but haven’t been contacted about work being done). Keith Memorial Theater/Opera House. Old State House. Quincy Market (main building). With markets, don’t get into tenant improvements, but do with how stalls are laid out. Have covenants with management that are separate. Lange Theater (not dressing rooms and backstage, but lobbies, theater, house, auditorium).

Ownership and Access: Whether privately or publicly owned, a significant interior may be landmarked if it’s deemed historically significant and is accessible. The only building that is residential is a former mansion converted to a condo – one can see a grand lobby through a glass door on the outside thereby meeting the “accessibility test. “Landmarked interiors do not require owner consent since the landmark process does not require it.

Political or Legal Challenges and Climate: Enforcement is always an issue. Although they haven’t had any issues that they’re aware of, they don’t have the staff to offer sufficient oversight. There are similar issues with interior preservation easements where access is an issue.

There have been no political or legal challenges since Church of the Immaculate Conception in the mid-1980’s, which successfully challenged its designation based on freedom of religion to the Massachusetts Supreme Court.

Incentives: Boston’s Department of Neighborhood Development (DND) offers Historic HomeWorks grants for historically appropriate exterior work. There are also Boston HomeWorks grants for general exterior and interior rehab work.

Online documentation location: Boston Landmarks Commission: <http://www.cityofboston.gov/environment/landmarks.asp> ; Historic Districts Commission: <http://www.cityofboston.gov/environment/historic.asp> ; Preservation Act: http://www.cityofboston.gov/environment/pdfs/BLC_Preserv_Act.pdf

Contact Info: Boston Landmarks Commission Ellen Lipsey, 617-635-2510; Preservation Planner, Environment Department 617-635-3850

11. Detroit, MI

Ordinance: Detroit’s original preservation ordinance was passed in 1976, and amended in 1979 to allow interior designations. The ordinance is updated each time a building or district is designated, and the designation is registered in the properties’ deed.

Resources Designated: Although interiors/interior features are not specifically described as elements to designate, review of permits is described as follows: “The historic district commission may consider interior features only if specifically authorized to do so in the ordinance designating the historic district.” There are currently **14 interiors designated** - 11 churches, 2 public buildings and 1 commercial building. Only the public spaces are identified. Everything is called a district (single and multi-building districts); there are no landmarks.

Ownership and Access: An interior access agreement is required to be signed just before the property is designated. Owner consent is required for designation, and all of the interiors designated so far have been by owner request.

Political or Legal Challenges and Climate: Some Churches seem to think a designation will help them raise funds and would alleviate concerns that subsequent owners will care for the valuable art and architecture. No subsequent owner has yet challenged a designation.

Incentives: State tax credit program exist which are dependant on local designation.

Online documentation location: Advisory Board:

<http://www.ci.detroit.mi.us/legislative/BoardsCommissions/HistoricDesignationBoard/>;

Ordinance: <http://www.ci.detroit.mi.us/historic/ordinance.htm>; Criteria for designation;

<http://www.ci.detroit.mi.us/legislative/BoardsCommissions/HistoricDesignationBoard/>

Contact Info: Deborah Goldstein, Historic Designation Supervisory Specialist; (313) 224-3487; Historic Designation Advisory Board

12. Ashville, NC

Ordinance: Ashville's ordinance to establish the Historic Resources Commission, adopted in 1979 is also directly related to the North Carolina enabling legislation and always allowed for the designation of interior features. Each designated property has its own report and ordinance.

Resources Designated: Interior features may be designated in Ashville, NC. Normally, when a landmark report is prepared, significant interior features are described. **43 landmark buildings**, and 1 cemetery are designated. Staff hasn't tracked interiors separately but estimates that **at least half have interior features designated**.

Ownership and Access: Usually the owner seeks the designation of their property. Owner actually describes which interior features should be designated and staff must find that interior has integrity. Features, and not whole interior, generally designated.

Political or Legal Challenges and Climate: Enforcement is through pre-permit review. Generally owner-requested.

Online documentation location: <http://www.ci.asheville.nc.us/planning/historic.htm>

Contact Info: Stacy Merten, Historic Resources Commission Director 828-259-5836

13. Charlotte, NC

Ordinance: The Commission was created in July 1973 by joint action of the Charlotte City Council and the Mecklenburg County Board of Commissioners. Charlotte draws all of its powers and language from the NC enabling legislation, which allows for designation of interiors.

Resources Designated: Local historic districts have no interior component; interiors are designated only in landmark properties. **300 landmarks designated; about 75% include interiors.** Sometimes not included because of owner non-consent, or don't qualify for designation. Once designated as a landmark, property owner is required to go through pre-permit design review for any changes.

Ownership and Access: The NC Enabling Legislation allows for the designation of publicly owned significant interior features as well as privately owned features where the owner has given consent. This consent is included in the property's deed, and is binding to future owners.

Incentives: Tax NC state law allows for up to a 50% (depending on the amount of property designated) tax deferral for locally designated property. If only the exterior is designated, only a percentage is considered. If interior and exterior, the full 50% is possible. Once designated as a landmark, for the next 100 years owners pay a lowered tax. Tax credit recaptured if designated property altered or demolished.

Enforcement problems: With the 50% tax reduction, there are a lot of people wanting it. Problems mostly come with residences. The residential market is hot, and older homes are in desirable neighborhoods. As houses turn over, with perhaps 4 owners since designation; there is not effective way to let owners know what their responsibilities are (is in the deed, but responsibilities aren't described). Mostly a problem with homeowners.

Online documentation location: <http://www.cmhpf.org> OR <http://www.landmarkscommission.org>; Ordinance : <http://www.landmarkscommission.org/coursehome.htm>

Contact Info: Stuart Gray, Assistant Consulting Director, Charlotte-Mecklenburg Historic Landmarks Commission;; E-Mail/N4JFJ@aol.com; UNCC: 704-687-4642, HLC: 704-376-9115, HOME: 704-333-5862; Mobile: 704-651-9433

14. New York, NY

Ordinance: The Landmarks Preservation Commission was established in 1965 in response to New Yorkers' growing concern that important physical elements of the city's history were being lost despite the fact that these buildings could be reused. Events like the demolition of the architecturally distinguished Pennsylvania Station in 1963 increased public awareness of the need to protect the city's architectural, historical, and cultural heritage.

New York State Preservation Law, enacted in 1965, states: "its purpose as promoting the use of historic districts, landmarks, interior landmarks and scenic landmarks for the education, pleasure and welfare of the people of the city." (from Kenny thesis). New York City's Landmarks Ordinance states: "the Commission is authorized to landmark an interior 30 or

more years old that is customarily open or accessible to the public, or to which the public is customarily invited, and which has a special historical or aesthetic interest or value as part of the development, heritage or cultural characteristics of the city, state or nation.”

Resources Designated: There are four types of landmarks – individual landmarks, interior landmarks, scenic landmarks and historic districts. Interior Landmarks are building interiors that are “customarily open or accessible to the public,” such as the Marine Air Terminal at LaGuardia Airport, the RCA Building Lobby, and the Ed Sullivan Theater. Interior Landmarks need not also be designated as a building or have exterior elements.

104 Interior landmarks, 23,068 total designated properties. Includes Grand Central Terminal (designation and alteration permit denial upheld by the US Supreme Court in 1978), Time & Life Building, National City Bank, Daily News Building, RCA Building, and the LaGuardia Marine Air Terminal.

Political or Legal Challenges and Climate: Successfully defeated US Supreme Court challenge to permit denial for Grand Central alterations in 1978. 1993 TIAA unsuccessfully challenged the designation of the Four Seasons restaurant within the Seagram Building. It was also found that nowhere in the Landmarks Ordinance did it maintain that the Commission needed owner consent to landmark the building.

Contact Info: Mary Beth Betts, Director of Research, 212-669-7801 ; Ann Carlin, Violations officer, 212-669-7951; New York Landmarks Commission (212) 669-7817

Online documentation location: website: www.nyc.gov/html/lpc/home.html

15. City of Rochester, NY

Ordinance: For local landmarks to be designated two separate agencies must agree – Rochester Preservation Board (historic) and City Planning Commission (neighborhood character). Sometimes people request historic landmark status. The application must prove historic integrity, no adverse effect on public improvement/renewal projects, etc. There was one recent case where the Preservation Board approved the designation of a Cathedral, but the Planning Commission did not.

Resources Designated: There are currently **2 interiors designated – auditorium theater (publicly accessible), and an old automobile showroom (now a coffee shop) both privately owned and publicly accessible.**

Ownership and Access: There are many public buildings that are worthy of interior designation, but this designation is not sought because their being in public ownership is considered sufficient protection. There is no formal restriction on publicly owned buildings, but the staff points to a culture of preservation that dictates good public behavior.

Online documentation location: http://gcp.esub.net/cgi-bin/om_isapi.dll?clientID=55830&infobase=rochestr.nfo&softpage=Browse_Frame_Pg42; § 120-193. Procedures approved by the Preservation Board and Planning Commission

Contact Info: Dorene Laudisi, (585) 428-8095; Maryellen Coglitore (City Staff, Rochester Pres. Board) 428-7238

16. Portland, OR

Ordinance: The Ordinance reads that a Historic Landmark designation may include buildings, a portion of a building, sites, trees, statues, signs, or other objects or spaces that the City or the Keeper of the National Register of Historic Places has designated or listed for their special historic, cultural, archaeological, or architectural merit.” Interior features are interpreted as falling under the definition of “historic objects.” Interiors are specifically mentioned in process (“designate public interior space”) and enforcement (“alteration of an interior space when that interior space is designated as a Historic Landmark” triggers historic design review) sections of the in the code. Interiors were first designated in 1979.

Resources Designated: Portland doesn’t have an active program to designate interiors, although possible by Ordinance. **2 interiors designated out of approximately 500 individual landmarks** including Cotillion Hall, now called the Crystal Ballroom.

Ownership and Access: Written owner consent is required for Historic Landmark and Conservation Landmark designations. Interior spaces are expected to be publicly accessible, although that may include paid entry, as with the Crystal Ballroom.

Political or Legal Challenges and Climate: In late 1990s in Oregon, there were some changes to the legal framework to require owner consent. Since then, owners interested in designation go straight to National Register listing since there are no incentives to designate locally. As a result, the city now regulates based on National Register listing.

Advice for Philadelphia from Portland: “None of this is terribly clear, and I don't think a model for Philadelphia. I think the important piece if you are crafting a new interior designation process is to have clear definitions and require that the character-defining and significant features of designated interiors be clearly described so that future application of regulations and/or incentives have clear guidance about what is protected.”

Online documentation location: Historic Landmarks Commission:

<http://www.portlandonline.com/bds/?&c=dfgcd&a=ejhig>

Ordinance: sections 33.445 and 33.846: go to "Zoning Code" Under "Documents & Maps" at: <http://www.portlandonline.com/planning/>; Designation Criteria at

<http://www.portlandonline.com/shared/cfm/image.cfm?id=53488>

Contact Info: Nicholas T. Starin, City Planner, Historic Preservation; 503.823.5837, nstarin@ci.portland.or.us

17. City of El Paso, TX

Ordinance: Current ordinance, which dates from 1982, allows for the designation of interiors.

Resources Designated: 6 building interiors are included in the downtown historic District (which includes 6,000 parcels total). The District allowed for Landmarks, contributing and non-contributing buildings. Designated interiors are very significant interiors of very significant buildings. In addition to designated interiors, any other landmarked public

building is subject to interior review. This includes about 10 buildings, including the old public high schools and the Union Station.

The City relies heavily on SHPO (Texas Historical Commission) review and adheres to the Secretary of the Interiors' Guidelines. All changes to publicly owned buildings are reviewed by the state. El Paso requests state review of proposed changes to all privately owned historic buildings as well. If the THC declines to review the proposal, El Paso uses the Secretary of the Interiors' Guidelines.

Ownership and Access: Not all designated interiors are public; some are private. None of the interiors are residential – all are commercial, including a public theater.

Political or Legal Challenges and Climate: Private owners have been supportive to date. However, with short staffing issues, El Paso has not tried to designate additional interiors. The Historic Preservation ordinance is currently being revised; the PowerPoint presentation describing the proposed ordinance change may be found at: http://www.ci.el-paso.tx.us/planning/documents/Ord_Prez_FINAL_Changes.pdf

Online documentation location: http://www.ci.el-paso.tx.us/planning/historic_preservation.asp

Contact Info: Christina Vice; Historic Preservation Coordinator; (915) 541-4024/4930

18. Seattle, WA

Ordinance: Designation of interiors is not dictated by state enabling legislation or local ordinance. The Ordinance requires a description of significant “particular features and/or characteristics.” Seattle interprets the ordinance to allow designation of interior features that sufficiently meets general designation criteria and contributes to the resource.

Resources Designated: Seattle has **300 designated buildings, but do not count interior features separately.**

Ownership and Access: In general, most recent interior designations have been in commercial buildings/institutional buildings and have included features that are in spaces that are accessible to the public. There are, however, a number of interior features designated in private homes.

Political or Legal Challenges and Climate: Designation of interiors within private homes has been problematic, on occasion, especially when ownership of the property changes. For the most part, the interior features are features that the owner nominating the property wants protected at the time of designation. It is often difficult when the property is sold or the owner dies and the new owners/heirs are not as sympathetic to the interior designation. Because there is no way to know if interior features of private homes have been changed (unlike public buildings), the City is usually only notified when an owner tries to get a building permit for renovations.

Incentives: Washington has a state tax credit for certified rehabilitation of historic properties. Other incentives may include city code relief and other city-based incentives. Once landmark designation passes through quasi-judicial Landmarks Preservation Board (doesn't have to go through City Council) staff sits down with building owner to negotiate controls and incentive agreement. Incentives include code relief. That Agreement is a decision that is approved.

Online documentation location: The nomination, designation, and Controls and Incentives process and appeal procedures are described in detail in the [Seattle Landmarks Preservation Ordinance \(SMC 25.12\)](http://clerk.ci.seattle.wa.us/%7Escripts/nph-brs.exe?s1=25.12&s2=&S3=&Sect4=AND&l=20&Sect1=IMAGE&Sect3=PLURON&Sect5=CODE1&d=CODE&p=1&u=%7Epublic/code1.htm&r=1&Sect6=HITOFF&f=G): <http://clerk.ci.seattle.wa.us/%7Escripts/nph-brs.exe?s1=25.12&s2=&S3=&Sect4=AND&l=20&Sect1=IMAGE&Sect3=PLURON&Sect5=CODE1&d=CODE&p=1&u=%7Epublic/code1.htm&r=1&Sect6=HITOFF&f=G>

Contact Info: Karen Gordon, Supervisor and Historic Preservation Officer, karen.gordon@seattle.gov, (206) 684-0381
Beth Chave, Landmarks Preservation Board, Beth.Chave@seattle.gov, (206) 684-0380
<http://www.seattle.gov/neighborhoods/preservation/landmarks.htm>

19. Tacoma, WA

Ordinance: Tacoma has a mechanism in their Landmarks Special Review Districts Ordinance code (Chapter 1307-050, pg. 13-181) that allows for designation of significant elements; this can be interpreted as interpreting interior spaces and features. Current practice is that once a landmark is approved, Tacoma passes a resolution describing specific landmark elements.

Resources Designated: Many landmark buildings were designated twenty or thirty years ago, without much documentation. As a result, it is sometimes difficult to determine what is considered a significant element. If there exists no clear evidence of private property having a designated interior, the staff won't challenge proposed alterations. However, the staff reviews the interiors of landmarked public buildings whether or not the interior is specified in the designation. This is supported by the City's new Comprehensive Plan, which calls for preservation stewardship of publicly owned buildings.

Tacoma has **1,100 building in districts; 130 landmarks. There are 4 buildings with interior elements** including 2 significant theaters, main City building lobby, and the Union Railroad Station.

Ownership and Access: No owner consent is required, but City Council has final say on the designation process so consent is typically sought. Designations take place without consideration for whether a property is publicly or privately owned – whatever is in the resolution is what is recognized as landmarked.

Online documentation location: Landmarks Special Review Districts Ordinance: <http://www.cityoftacoma.org/22historic/Brochures%20and%20Forms/Chapter%2013.07%20Landmarks%20Special%20Review%20Districts.pdf?redir=no>

Contact Info: Reuben McKnight, 253-591-5191, reuben.mcknight@cityoftacoma.org

20. Washington DC

Ordinance: Washington DC's ordinance provides for interior landmarks, but not explicitly. An historic landmark is defined as a building, structure, object or feature and its site, or its site apart from a building. There is language elsewhere in the ordinance describing character

defining features (“The character of a historic interior may be defined by features such as room configurations, spatial relationships, stairs, trim, and decoration, and by materials such as partitions, woodwork, plaster and finishes”) and permit requirements (“An application involving an interior historic landmark shall include architectural plans sufficient to indicate the nature and design of proposed interior work. Plans may be in the form of or include annotated photographs.” “...The removal or destruction of all or a substantial portion of a designated interior landmark, unless the elements to be removed lack physical or historic integrity, or are not character-defining features; or ...,” and “Any removal or destruction requiring a partial demolition or raze permit under the D.C. Construction Code, including any demolition of non-bearing walls, interior finishes, or other interior non-bearing elements within a building where an interior space has been designated as a historic landmark.”

Resources Designated: Washington D.C. has **13-14 interior landmarks**. Regulations deal more with what are significant features in interior and what constitutes alteration or demo

Interiors are generally designated at the same time as the rest of the resource, although some have followed exterior designation. There are no interior-only landmarks.

Online documentation location: Ordinance

http://planning.dc.gov/planning/frames.asp?doc=/planning/lib/planning/preservation/pdf/title10a_final_083004.pdf Historic Landmark and Historic District Protection Act of 1978

http://planning.dc.gov/planning/frames.asp?doc=/planning/lib/planning/preservation/brochures/dc_law_2-144_march_05.pdf

Contact Info: Tim Dennee; Historic Preservation Specialist; Historic Preservation Division; 202-442-8800