

Township of Cheltenham

Montgomery County, Pennsylvania

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December 14, 2018

Douglas C. McLearen
Chief, Division of Archaeology & Historic Protection
Pennsylvania Historical and Museum Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Section 106 Parties, SEPTA Jenkintown-Wyncote Station ADA Improvements

Dear Mr. McLearen:

Please be advised that the Township's Public Affairs Committee recently reviewed the FTA's September 10, 2018 correspondence under the signature of Terry Garcia Crews positing a "no adverse effects" finding for this project.

The Committee strongly rejects this finding for the following reasons which are summarized herein:

We would like our objections to this "no adverse effects" finding and to the current formulation of the project to be included in the public record, and request meaningful revisions to the current ADA design that reflect the Historic Station use and also request explicit response to some remaining questions and concerns, as stated below:

- (1) The current project design continues to remove from the Historic Station the traditional rail rider services – enclosed waiting room, restrooms, retail opportunities, etc. – proposing to relocate them instead to an intrusive and unnecessary new building area some yards south, in the middle of a currently unnoticeable lot.
 - There is no need to divest the current Historic Station of these vital, historic functions, since viable, more desirable alternatives exist.
 - Relocating essential passenger services is an unnecessary subversion of the Historic function of the Historic Station with direct adverse impact on the Historic property.
 - The proposed modern structure is not necessary and impedes on the Historic integrity of the property and Historic District.
- (2) Necessary and desirable ADA renovations can be accomplished in cost effective ways not seriously pursued by SEPTA because of its prior commitment to the current design. One need only study

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SEPTA's solution to historic stations at Wayne, PA and at Wayne Junction, among other places, to see how ramps can be creatively used to prevent the need for electric elevators and other problematic challenges to this historic masterpiece. Even elevators - without the costly new station blockhouse - could be effectively redesigned to coordinate with the Historic Station, the tunnel and new ramps. Throughout this region, SEPTA has shown it CAN and HAS produced cost-efficient, desirable alternatives to preserve Historic properties. SEPTA must do that here as well.

- (3) Your letter mentions SEPTA's "commitment to retain the existing pedestrian underpass adjacent to the Historic Station Building." However, *retain* is not the same as *maintain in respectful condition*. [The omission of the word "maintain" is particularly noticeable here, since the phrase "retain and maintain" is used later in your letter with reference to the potential lease of the Historic Station building.] Only recently has long-needed restoration work to the underpass been made for safety and sanitation. We expect maintaining features of the underpass to include good repair of stairs and railings, water management systems, lighting, graffiti free, etc. It is at this level of maintenance that the commitment is necessary to meet Section 106 criteria for the Historic property. How will this written commitment be revised in your documents and implemented?
- (4) Your letter says, "SEPTA commits to retaining and maintaining the Historic Station Building for a period of no less than ten (10) years after opening the new ADA-compliant Station." We hope this was intended in a positive way, but the wording doesn't rule out the Historic Station's (a) demolition in/after year eleven (11); (b) demolition by neglect after year ten; or (c) the possibility that SEPTA could try to come back in eleven years, or thereafter, and petition for the removal of the Historic Station from the National Register's protection due to its own creation of an alternative station and its intrusion into/diminishing of the Wyncote Historic District. We maintain in our Section 106 argument that this construct is indeed an actual adverse effect and these scenarios must be proactively prohibited. The historic value of this Trumbauer passenger station on the National Register does not diminish over time, but in fact increases. As consulting parties, we need a revision to the written conditions, to guarantee commitment of the maintenance of this Historic Property for future generations beyond 10 years stated.
- (5) We believe Section 106 process requires that some form of restrictive covenant needs to be established that will (a) include the Station's ongoing use and maintenance as an esteemed, active, relevant railroad and passenger asset, and (b) protect the integrity of and future adaptive use of this Historic Registered Property.
- (6) We appreciate that the RFP processes can be rather unpredictable and that there are risks involved, preventing SEPTA from wanting to guarantee its procuring of Tenants. All the more reason that this entire process be a good faith effort in collaboration with the Section 106 parties. More than once in the past 8 years, SEPTA has been at the table with interested parties from Jenkintown and Cheltenham, indicating its interest in leasing the Historic Station restaurant areas. But we have no evidence that these representations were backed by good faith actions. Lack of action, punctuated by delays, excuses and absence of results, undermines trust in a non-court-supervised RFP process.
- (7) We ardently seek a collaborative solution between SEPTA and our communities to proceed expeditiously with the ADA redesign of this historic community monument, in such a way as to actually honor the intent of the 106 process, satisfy the consulting parties and the communities' concerns about preservation, and facilitate adaptive reuse of the Historic Station, District, and surrounding properties.

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We urge you to revise and reverse your ruling of “no adverse effects” due to the realities of this Historic setting, the impact of this Historic Station on our communities and the lack of good faith team effort to find a mutually compatible solution in keeping with SEPTA’s commitment to similar communities and stations across the region.

Thank you.



Bryan T. Havir
Township Manager

BTH/AR/sg

cc: Hon. Brendan Boyle, Congressman
Hon. Madeleine Dean, State Representative
Hon. Art Haywood, State Senate
Hon. Steve McCarter, State Representative
Board of Commissioners, Cheltenham Township
Theresa Garcia Crews, FTA, Regional Administrator
Jeffrey D. Kneuppel, SEPTA General Manager
Tamra Dann, SEPTA
Emma Diehl, PHMC
Mark Shaffer, PHMC
W. Russell Koerwer, Eastern Montgomery County Chamber of Commerce
Jody L. Holton, Montgomery County Planning Commission
Nicholas Zmijewski, Railroad Museum of Pennsylvania
James McCann III, Cheltenham Township Historical Commission
Christopher B. Chandor, Esq., Heritage Conservancy & Conservancy of Montgomery County
Jeffrey Olawski, Cheltenham Chamber of Citizens
George Locke, Jenkintown Borough Manager
Melissa Clark-Pho, Jenkintown Community Alliance
Deborra Sines-Pancoe, Jenkintown Borough Council
Tony DeSantis, Delaware Valley Association of Rail Passengers
Mark Eisold, Township Engineer
Wyncote BHAR
Henry Sekawungu, Director of Planning and Zoning