



# THE BOROUGH OF JENKINTOWN

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March 21, 2019

Mr. 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 Consultation SEPTA Jenkintown-Wyncote Station ADA Improvements  
ER No.: 2009-0756-091-E

Dear Mr. McLearen,

Jenkintown Borough Council respectfully urges you to REJECT the finding in the FTA's September 10, 2018 correspondence under the signature of Terry Garcia Crews positing a "no adverse effects" finding for SEPTA Jenkintown-Wyncote Station ADA Improvements project.

While Jenkintown Borough Council supports the proposal to provide ADA improvements to bring the platform up to modern standards, Council's primary concern in the renovation of the Jenkintown-Wyncote Station is that the passenger station and adjacent retail space be occupied and used.

Jenkintown Borough Council rejects the finding of "no adverse effects" for the following reasons:

- (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 these rail rider services to the new building/elevator tower proposed for the area south of the Lawrence Curry/Greenwood Avenue Bridge. Relocating essential passenger services is an unnecessary subversion of the historic function of the Historic Station and would have a direct adverse impact on this property.

Jenkintown Borough Council concurs with its neighbors in Cheltenham that these current vital, historic functions should remain in the Historic Station Building and that viable, more desirable alternatives can be found to keep them in place.

- (2) The proposed modern structure should be limited in its functioning to providing elevator service for the ADA improved platform.

Jenkintown Borough Council agrees that necessary and desirable ADA renovations can be accomplished in cost effective ways. Using examples from SEPTA's solution to other historic stations, such as Wayne, PA and Wayne Junction, among other places, to see how ramps can be used creatively along with the electric elevator to preserve the integrity of the historic district and this masterpiece, iconic station. Elevators – without the costly new station blockhouse – could be effectively redesigned to coordinate with the Historic Station. Throughout the region, SEPTA has shown that it CAN and HAS produced cost-efficient, desirable alternatives to preserve historic properties. SEPTA is urged to do so in Jenkintown – Wyncote as well.

- (3) Jenkintown Borough Council urges SEPTA to continue its commitment to retain the existing pedestrian underpass adjacent to the Historic Station Building and to MAINTAIN this section of the property in respectful condition. The Borough appreciates the recently accomplished and long-needed restoration work done to the underpass. This vitally important pedestrian passageway needs to be retained and maintained in the interest of safety and sanitation. We expect maintenance of features of the underpass to include good repair of stairs and railings, water management systems, lighting, graffiti free, etc. This level of maintenance will be necessary to meet Section 106 criteria for the Historic property.
- (4) Jenkintown Borough Council concurs with Cheltenham Township's assertion that SEPTA commit to retaining and maintaining the Historic Station Building in perpetuity, i.e. without a time constraint. We are concerned that the statement quoted, "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."

Jenkintown Borough Council supports the on-going status of the Jenkintown-Wyncote Station as a Historic Station on the National Register. We strenuously urge the revision of this language in order to protect and preserve the Wyncote Historic District and Jenkintown-Wyncote Station. 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 to see a revision to the written conditions, to guarantee commitment of the maintenance of Jenkintown-Wyncote Station Historic Property for future generations beyond "10 years" stated.

- (5) Jenkintown Borough Council concurs with Cheltenham Township's statement that 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.

The National Historical Register listed the Trumbauer station building. The Secretary of the Interior's Standards for Rehabilitation state *new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property.*

Additionally, Section 106 of the National Historic Preservation Act of 1966 states *an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register.*

In summary, Jenkintown Borough supports letters submitted by other concerned parties and stakeholders in that the proposed project, in its current design phase, will have an adverse effect on the Trumbauer Station Building. The proposed project as it is currently designed will detract from the current historical building as it will be removing most functions that the Station Building currently provides. Jenkintown Borough is concerned that the current project design will obscure, detract and diminish the use of the Trumbauer Station Building as well as its integral function in both the Jenkintown and Cheltenham communities.

We respectfully request that the current design be revised and that a memorandum or letter of understanding be submitted to the current parties and stakeholders, including Jenkintown Borough, prior to proceeding further with design plans for the ADA improvements.

We urge you to revise and reverse your ruling of "no adverse effects" due to the realities of this Historic setting, the impact of the Historic Stations on our communities and we urge you to support a good faith effort to find a mutually compatible solution in keeping with SEPTA's commitment to maintain its historic stations in communities across the region.

Sincerely,



George Locke  
Borough Manager  
Jenkintown Borough



Deborra Sines-Pancoe  
President of Council  
Jenkintown Borough