

**CAPITOL HILL RESTORATION SOCIETY**  
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Date: April 30, 2013

To: Gretchen Pfaehler, Chair, DC Historic Preservation Review Board  
David Maloney, Director, DC Historic Preservation Office

From: Shauna Holmes, Chair, CHRS Historic Preservation Committee

Re: Draft 2016 DC Historic Preservation Plan

We appreciate the opportunity to review and offer comments on this draft plan, which will guide the city's preservation efforts for the next four years. We also appreciate that this step is seen as the beginning of input from the public regarding the four-year plan, and that HPO and HPRB will be welcoming feedback throughout the life of the plan. Putting up front the Comprehensive Plan's vision for stewardship of DC's heritage gives the 2016 Plan a solid footing for all that follows and grounds the specific goals and objectives in one overarching goal: to preserve and enhance the city's unique cultural heritage, beauty, and identity by respecting its historic physical form and recognizing "the enduring value of its historic structures and places."

Of the five themes woven throughout the Plan, getting back to basics, finishing deferred maintenance, and sending more forceful and convincing messages are key to addressing many of the challenges identified in the Plan that struck a chord with us. In particular, some of these **major needs** include:

- *More guidelines*, including more specifics about various kinds of additions, evaluating and appropriately treating alley and accessory structures, and the importance of historic settings and relationships.
- Clear and readily available *information about what it means to own property in a historic district*. This is critical as counterpoint to the misinformation that abounds.
- *More practical "how-to" guidance* for owners of historic/contributing property, including how the preservation review process works for individual projects.
- *Stronger enforcement* of preservation violations, including work done without a permit, exceeding the scope of issued permits, demolition by neglect, and vacant and/or abandoned properties.
- *More accessible, easier to use HPO/HPRB website*. While there's much valuable information on the current website, it's hard for homeowners to find what they need to know. This in turn helps feed a perception that preservation is arcane and opaque. Frequent inability to access material on OP's server is also very frustrating for those seeking information, including us.
- For HPO and HPRB, *establishing clearer bases for making determinations* about compatible and incompatible changes to historic properties [page 44], and explaining them to property owners so decisions don't appear arbitrary and capricious. This could involve new ways of articulating, organizing, and presenting the kind of information often included in staff reports, as well as capturing and synthesizing HPRB comments and reasons for concern, and then making it available and searchable online.

Section 5, which clusters and sets out goals, objectives, and actions, is the meat of the Plan. Following are some thoughts and observations about them and suggestions about what we view as priorities.

- A1. Time and again we see alley structures neglected, dismissed as unimportant, and/or considered ripe for demolition. Conducting and completing alley surveys would be an important first step toward recognizing the significance of these structures. Equally important would be issuing guidelines about alley structures that would articulate their historic significance and provide guidance about appropriate evaluation and treatment. We suggest designating this action as a priority.
- A2, A3 & B1. Telling stories about the city's historic places more often, more vividly, and more compellingly is key to engaging residents and giving them a better understanding of where they live and why it's important. At a recent CHRS board retreat, we too identified this as a goal and have already started increasing our story-telling efforts. HPO and HPRB are uniquely positioned to lead on this front. The designated priority actions for A2 and A3

should be a good start, and we encourage adding as a priority the item in B1 about “link[ing] recreational and neighborhood heritage trails through coordinated guides and physical connections.”

- B2. Speaking out about preservation is crucial, and we agree that strengthening and better using our many voices to advocate for preservation will be vital. We also support revitalizing the Historic Districts Coalition as a collective voice and recommend designating “Write about preservation success stories” as a priority.
- B3. Producing online exhibits of archeological artifacts from DC collections is an excellent priority for educating people about the city’s past. So many children and adults are fascinated by what’s dug up that this will be a valuable addition to the many ways HPO can newly engage the public.
- C1. We could not agree more that priorities for designation should emphasize properties that are most likely to be at risk. CHRS’s most notable success in this regard was, in cooperation with HPO, expanding the Capitol Hill Historic District to include the area between I-695 and M Street SE. Even so, the Lower 8<sup>th</sup> Street area is under tremendous pressure as M Street’s large-scale development moves farther east, with a 90-foot tall building approved for construction immediately across 7<sup>th</sup> Street from the landmarked Blue Castle and Lower Barracks Row property owners actively exploring how big and high they can build. With H Street NE’s welcome revitalization, development pressure is intense there too, and eligible properties are being lost or disfigured at an alarming rate. We urge HPO to give this goal a high priority, and accordingly making the action item for identifying community priorities for designation a high priority as well. “Acting before it’s too late” [C3] comes into play here too, with Spingarn High School a poster child for designation not occurring until it was too late to influence city agency decisionmaking. Though Spingarn’s historic significance had been noted in the DC schools multiple property nomination, it wasn’t until a streetcar maintenance facility was irrevocably foisted onto the school’s campus that the school’s historic importance was officially recognized. Therefore, we’re glad to see a goal in the 2016 Preservation Plan for HPO and HPRB to proactively work with communities to designate and protect eligible properties and areas threatened by development and inappropriate projects.
- C2. We definitely agree with the need for more clear communications and the related priority actions, particularly issuing more detailed guidelines on additions to residential properties. Most of the projects we see are for additions to rowhouses, including pop-ups, and property owners badly need more clarity so they can understand what is and isn’t compatible and why. It would also be helpful for such guidelines to address reasons why piling additional stories onto aging rowhouses can sometimes threaten their structural integrity.
- C3. We’re very happy to see “Acting before it’s too late” as a clearly established goal. As our historic district faces pressures for more infill construction and bigger buildings, both within the district and at its boundaries, action and resolve are desperately needed to withstand pressures brought to bear by developers and individual property owners who want to make everything as big as it can be. For instance, we’ve seen a single block on the perimeter of the historic district lose more and more of its integrity as its buildings get bigger and bigger, one by one, and we fear this trend could continue. We wholeheartedly support prioritizing stronger enforcement efforts; more effective fine schedules; targeted pursuit of the most severe cases of demolition by neglect; and improved means of discouraging pop-ups, overscaled intrusions, and incompatible development that disfigure the character of historic neighborhoods and corridors. Specific timeframes should be set for adopting fine schedules and other regulations and/or procedures needed to enforce property maintenance and permitting provisions. It was gratifying to see this section illustrated with a Capitol Hill success story, the dramatic transformation of a badly deteriorated corner rowhouse at 8<sup>th</sup> & C NE into a beautiful, high-end residence, and we encourage HPO to further publicize such examples of success.
- D1. Given the development pressures noted above, we consider it a necessity to make a stronger case for the relationships between preservation, sustainability, and economic growth. Again, HPO and HPRB are uniquely positioned both to encourage investment in historic properties and to promote and adopt financial incentives to help revitalize DC’s Main Streets and other commercial corridors, areas, and historic properties with commercial potential. The transformation of the Old Naval Hospital into the beautiful and much-used Hill Center is our community’s poster child for what can be made possible with the help of financial incentives. Because making preservation economically attractive

is one of the most effective items in the preservation toolkit, we're very happy this Plan has designated it as a major objective.

- D4. Likewise, the objective to enact incentives for reinvesting in historic buildings as affordable housing and small businesses should help meet existing needs while achieving preservation purposes.
- D2. We share HPO's view that strengthening public coordination of the preservation review of DC government projects needs improvement, and suggest that the Section 9b draft regs and procedures include broader provisions for community and public involvement. At present they only suggest participating through ANCs, which is not sufficiently inclusive or effective. To that end, we suggest prioritizing the last three action items as well so that efforts to designate additional eligible properties don't take place at the expense of those already designated and at risk – for example, making the historic Crummell School a parking facility for buses without considering its significance, or turning historic Virginia Avenue Park into a staging area for 11<sup>th</sup> Street Bridge construction, which it took a lawsuit to prevent. Equally important are ensuring that agency managers and planners are familiar with preservation review requirements and procedures, and coordinating closely on preservation planning for public facilities like schools, libraries, fire stations, and recreation centers. The latter require especially sensitive consideration because residents identify closely with these facilities and care deeply about what happens to them, as we've seen with some ongoing projects in the Capitol Hill community. Integrating preservation into agencies' planning processes as early as possible is essential, so that preservation issues are taken into account before people become strongly invested in specific locations, designs, or other project elements.

We really like the way the Implementation section has linked a report on HPO's accomplishments of the last four years to the Comprehensive and Preservation Plans and has specified related 2016 goals for following-up and pursuing in the next four years. While we don't have item-by-item comments, we do have some observations and suggestions to share.

- HP-1.1.1 The 2016 Preservation Plan makes an eloquent case in the beginning for the importance of the city's unique mid-rise scale, noting that the city's scale and historic architecture are prime sources of its charm. We wholeheartedly endorse the resolve articulated in the Comp Plan block that this fundamental character must be protected and remain inviolate.
- HP-1.2.1 In the Accomplishments block, we suggest revising the third sentence to read: "Community sponsors completed surveys of Lanier Heights and greater Capitol Hill outside the historic district, including the north and south portions of Hill East and the area just north of F Street NE. HPO surveyed Meridian Hill and cemeteries."
- HP-1.2.5 The first sentence would read more accurately thus: "ANC 6B and CHRS surveyed the southeast portion of Hill East, and ANC 6A and CHRS, with support from the Rosedale Citizens' Association, surveyed the northern portion of Hill East."
- HP-1.3.3 Spingarn High School was designated in late 2012. Should it be added to the list here?
- HP-1.4.5 ANC 6B sponsored the nomination for the Barney Circle Historic District. We understand this was submitted in 2007, but 6B voted in October 2010 to reaffirm its support and sponsorship of the application.
- HP-2.3.2 We want to affirm our support for all necessary measures to preserve the horizontal character of the city through enforcement and retention of the Height Act. CHRS has also adopted a resolution supporting protection of historic streetscapes and views from intrusions by overhead wires of any kind.
- HP-2.3-B We agree that the overly rushed schedule for the new 11<sup>th</sup> Street Bridge led to less effective consultation on the project. There was insufficient consideration of the affected historic districts, and the Capitol Hill community had no idea Section 106 review was underway. Further, though SHPO signed the Programmatic Agreement in good faith with protective environmental commitments in the FEIS, some of those commitments were later removed and not carried over into the ROD (for example, five of six FEIS commitments to protect historic Virginia Avenue Park were not in the ROD ). Per HP-2.5.1, we also agree this project was a missed opportunity for better civic design. Because major city projects like this require less hurried review to ensure historic properties and districts don't get short shrift, we were happy to see strengthening government partnerships identified as a primary goal.
- HP-2.4-A Shouldn't the considerable work on permit review be recognized here too? This is an important chunk of time and effort.

- HP-3.3.2 We appreciate that CHRS public outreach efforts are recognized here, and suggest revising the last sentence to read: “The Capitol Hill Restoration Society continued its quarterly community forums, co-sponsored four presentations on historic survey results for members of the community, held a workshop on federal preservation and environmental reviews, and sponsored a series of Preservation Cafes on house history and caring for historic homes.”

We commend the tremendous dedication and hard work that went into preparing this four-year plan and look forward to working with HPO during its implementation.