

**Testimony of the Capitol Hill Restoration Society
before the DC Historic Preservation Review Board on March 28, 2019
209 C Street, SE (HPA 19-218)**

My name is Beth Purcell and I am testifying on their behalf of the Capitol Hill Restoration Society's Historic Preservation Committee. Thank you for considering our views. We reviewed the plans for the project dated February 26 and March 5, 2019.

This house was built in 1887 or earlier as a freestanding two-story brick bay front house. Between 1916 and 1928 a side addition was built, filling in the space between 207 and 209 C Street.¹ It is a contributing building. In HPA 15-503, the Board approved a three-story rear addition, to extend as far back as a one-story rear addition, filling the space from lot line to lot line. The Board's order reads:

CAPITOL HILL HISTORIC DISTRICT Sept. 24, 2015 consent calendar

209 C Street SE, HPA 15-503, concept/roof addition.

The Board wanted to ensure that the original entry stairs are retained.

In HPA 19-218, the applicant seeks to modify the concept in HPA 15-503 to include additional proposed features: a basement, a basement entrance in front. The applicant has already begun the work proposed in HPA 19-218. A stop work order was issued on March 5, 2019 and was still in effect as of March 25, 2019.

Our primary concern in this case is the applicant's proposal to provide an accessible entrance in the front by making an at-grade cut in the retaining wall. Retaining walls are character-defining features. HPRB, *Landscaping, Landscape Features and Secondary Buildings in Historic Districts*, 5. The staff report views this property as having "unique circumstances" and suggests two reasons for approving cutting through the retaining wall:

- (1) the side addition is distinct and had its own smaller entrance and smaller stairs;
- (2) to shield utility meters and trash storage.

This property is not unique; there are Capitol Hill houses with historic side additions or basement entrances. In addition, in the past, this side addition had its

¹ Hopkins map (1887); staff report in 209 C Street, SE, HPA 15-503.

own entrance inside the intact retaining wall. These facts do not justify damaging the character-defining retaining wall.

Nor does hiding trash cans and meters justify damaging the character-defining retaining wall, and would set a bad precedent because future applicants could argue that they are also hiding meters and trash cans, and will argue that hiding meters and trash cans is *alone*, a sufficient justification.

This cut through the retaining wall is not compatible with the historic district and the Board *should* apply the historic preservation law and reject this proposal. The applicant has other avenues achieve his objectives, by appealing to DCRA under the ADA.² If the applicant can make a successful case to DCRA, DCRA may approve the cut to the retaining wall under the Americans With Disabilities Act. In 325 D Street, SE, HPA 14-536, another case involving cutting through a retaining wall,

[T]he Board found the concept of the basement entrance to be incompatible with the Capitol Hill historic district and inconsistent with the preservation act. If a basement entrance is deemed acceptable, the slope of the ramp should be minimized, and removal of the left retaining wall should be studied.

Thus, the Board can apply the preservation act, and suggest how, if approved by DCRA, the entrance should be designed.

The current plans for basement entrance and window wells satisfy HPRB's *Preservation and Design Guidelines for Basement Entrances and Windows*. We agree with the staff's recommendation that the primary entrance stairs be restored and reinstalled, that the roof deck approved in HPA 15-503 be not be expanded, and a flag test for the visibility of the mechanical units and solar panels.

We believe that this project is not compatible with the Capitol Hill Historic District.

Thank you for considering our comments.

² Actually, the relevant statute is the DC Fair Housing Act.