Testimony of the Capitol Hill Restoration Society before the DC Historic Preservation Review Board on March 28, 2019 620 C Street, SE (HPA 19-222)

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 comments. We reviewed the plans for the project dated March 1 and March 18, 2019.

This two-story three-bay flat front brick building is a contributing building. It was constructed in 1882 as a one-story blacksmith shop for Richard Rothwell, 20 feet wide and 36 feet deep. In 1905 Charles Speiden built a one-story rear addition, 15 x 20 feet, to be used as a blacksmith shop. Sometime between 1904 and 1928, a brick second story addition was built during the period of significance, which ended in 1945.

HPRB's publication *Design Guidelines for Historic Commercial Buildings* states:

A commercial area's identity is defined in large part by its physical design - the overall layout of the streets, and the physical placement of buildings and public spaces and the design of individual buildings. Washington's commercial areas are defined not by rigid consistency by variations in height, architecture, and material that reflect the style, era of construction, and flavor of the surrounding neighborhood. p. 1.

Small buildings in the Capitol Hill Historic District, like 620 C Street, are valued and form part of the iconic Capitol Hill sawtooth skyline.

Our primary concern in this case is the plan to construct a pop-up on the front of the building. Additions to commercial buildings must not be visible from public space. HPRB, *Additions to Historic Buildings*, p. 13. The Board has applied this important principle in recent cases involving commercial buildings. For example, the Board rejected a new visible third and fourth story on the commercial building at 507 8th Street, SE (HPA 16-518), and at 523 8th Street, SE (HPA-17-246) allowed a rooftop addition provided that the HVAC units would be minimally visible. The applicant mentioned Union Garage, 645 Maryland Avenue, NE, a condominium project. That is a very deep building and the new second and third stories are set back.

The proposed third story addition would be visible from public space, alter the skyline, making this building taller than the adjacent buildings. For this reason we urge the Board to reject the project's implicit and erroneous theory that because other nearby buildings are taller, it is acceptable to visibly increase the height of 620 C Street. This case would set a very bad precedent. Future popup applicants will argue that if any "substantive alterat[ion]" or expansion to a building occurred during the period of significance, then it is permissible to make a new major change today that would normally violate a key principle in the preservation act.

Zoning rules do not excuse violating the preservation act. The applicant can pursue zoning relief and comply with the preservation act.

The project also proposes to alter all the openings on the first story, a primary elevation, which is discouraged for historic buildings. HPRB, *Walls and Foundations of Historic Buildings*, 7. The applicant has provided photographs of the window openings. Prior, modest window alterations should not justify significant changes in fenestration. If the applicant can document and wants to recreate the historic window configuration, that would be commendable.

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

Thank you for considering our comments.