

**Testimony of the
Historic Preservation Committee of the Capitol Hill Restoration Society
before the DC Historic Preservation Review Board
647 G Street, SE HPA 23-096
February 23, 2022**

My name is Beth Purcell and I am testifying on behalf of the Capitol Hill Restoration Society's Historic Preservation Committee. We reviewed the plans posted on HPO's website on November 21, 2022 and February 2, 2023. We believe that this case presents the risk of making two very bad precedents, one procedural and one substantive.

November 2022 plans

The applicant originally planned to expand the building by excavating a new level below the existing basement, renovating the interior, and adding a small rear extension. The single-family house would be converted into five units: Basement/cellar: unit 1, wheelchair accessible; First floor: units 2 and 3; Second floor: unit 4; Third floor: unit 5. The current basement was labeled "First floor" in the plans. The existing basement is a typical Capitol Hill English basement, with an entry door and two front windows providing natural light with the aid of narrow light well. The grade on site slopes down towards the rear of property partially exposing the existing basement. The new lowest level, 10 feet below the existing basement, would have been rather dark, with street-side bedroom windows at the bottom of a downward extended lightwell, expanding the areaway out six feet into the front yard, and rear rooms open to new excavated areaway/patio.

The staff report for the December hearing, which we supported, noted,

The extent of demolition might qualify as a demolition as per DCMR 10, Section 305(b) because of the removal of the rear walls, roof, and potentially all interior framing and floor assemblies. There is no information provided to show that the interior framing and floor assemblies are beyond repair or structurally unsound.

At the hearing on December 15, 2022, the Board concluded:

647 G Street SE, HPA 23-096, concept/three-story rear addition and front areaway. The Board found the extent of demolition to be inconsistent with

its regulations and the proposed areaway to be incompatible with its guidelines and the Capitol Hill Historic District. Vote: 5-0.

February 2023 plans

Areaway: The applicant has reduced the number of units from five to four, and eliminated the expanded areaway. We believe that this change satisfies the Board's order.

Demolition: The demolition plans appear unchanged from the November plans. The staff's statement at the December hearing remains true: "There is no information provided to show that the interior framing and floor assemblies are beyond repair or structurally unsound." The applicant has added several photographs of the interior which appear to show dated, perhaps dirty conditions, but not structural deficiencies. Sheet H008 shows a cross section with the caption "remove only joists required to be removed structurally." We are unsure what this statement means. The applicant has again failed to provide support for the extensive amount of demotion proposed.

The staff report notes that "there is still a lack of clarity regarding the extent of interior structural demolition" but recommends that the Board find the project compatible and that the Board should require the applicant to provide staff "with clear and realistic drawings indicating the extent of structural demolition of all floor, roof, and wall assemblies." This case raises the potential for a bad precedent: an applicant can defy the Board's directions, receive concept approval with an opportunity to provide critical missing information to staff. Instead, the Board should deny concept approval or give the applicant another chance to comply by coming before the Board with the required information.

Basement/celler unit: The second potentially bad precedent is the largely windowless basement unit. The applicant still proposes to excavate a basement/cellar addition the full depth of the building. The plan for the basement unit shows one bedroom with the required window and three windowless spaces ("den not to be used as a sleeping area"). The plans show three bathrooms in the cellar unit, suggesting occupancy by more than one person. H0007.

Traditional Capitol Hill basement apartments have good natural lighting through doors and windows. The current plans strongly suggest that only the occupants of the bedroom with a window will have regular access to natural light and ventilation; but the occupants of three other windowless spaces will not. It is

questionable whether this sub-basement unit meets the long-accepted basic requirements of good housing (safe, decent, and sanitary), but it clearly does not meet Capitol Hill's tradition of attractive and healthful English basement apartments. In the past such extensive demolition and excavation has resulted in additional unintended damage to the remaining building and to adjacent buildings. For this reason the Board should not approve this basement unit as proposed.

Traditional building forms, such as basement units with natural light and ventilation, should be protected, whether or not they are entirely visible from public space. Examples include:

- protecting doglegs from infill, 223 8th Street, NE, HPA 22-329
- preserving weather vestibules, 240 9th Street, NE, HPA 15-140
- opposing façade-ectomy, 418-420 7th Street, HPA 17-481

We agree with the staff's concerns about visible railings on the roof.

While the project is impressive for the ingenious and presumably costly way applicant proposes to create multiple dwellings in this particular location, we believe that because of the extensive demolition planned and the dark and unventilated basement living spaces, at this time this project is not compatible with the Capitol Hill Historic District.

Thank you for considering our comments.