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**HISTORIC PRESERVATION REVIEW BOARD  
STAFF REPORT AND RECOMMENDATION**

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| Landmark/District: | <b>Georgetown Historic District</b>            | (x) Agenda                      |
| Address:           | <b>1212 and 1214 28<sup>th</sup> Street NW</b> |                                 |
| Meeting Date:      | <b>February 23, 2017</b>                       | (x) Demolition                  |
| Case Number:       | <b>17-174</b>                                  | (x) Addition<br>(?) Subdivision |
| Staff Reviewer:    | <b>Tim Dennée</b>                              | (x) Concept                     |

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The applicant, property owner 1212 28<sup>th</sup> Street LLC (with Studio Twentyseven Architecture), requests the Board's review of a project to connect two buildings internally, to construct a rear addition, and to perform significant demolition of a pre-Civil War house.

This project has been undergoing review by the U.S. Commission of Fine Arts (CFA) from which it has received concept approval. As the Commission's review jurisdiction is limited to projects that would be at all visible from a public thoroughfare, and the rear of 1212 28<sup>th</sup> Street would be barely visible across the little pedestrian alley along 1210 28<sup>th</sup>, the Commission's review could not be especially strict.

Two abutting buildings would be joined. One, 1214 28<sup>th</sup> Street, was constructed in 1933 as a commercial garage and was later renovated with a second story.<sup>1</sup> The garage was built to the depth of its lot (or at least added onto to reach that depth by 1937).

The other building, 1212 28<sup>th</sup> Street, appears to date to the 1850s, a semidetached two-story Greek-Revival house, characterized by a high base, eyebrow windows at the second level, and side gables. Its elaborate door surround is more typical of Italianate rowhouses of the same period. Other than this detail, the house is modest, especially in size, being only 12'6" wide and having no rear wing originally.<sup>2</sup> The house now has a one-story brick addition at the rear of the basement and an enclosed porch on top of that. These structures would be demolished.

That minor demolition would make way for a two-story addition behind 1212. But the addition would not be located entirely behind the historic house. It would begin at the roof ridge, connecting its second-floor space to the house's attic. This means that the rear half of the old roof would be demolished. The house's original masonry rear wall would also be removed.

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<sup>1</sup> It replaced a pre-1888 house.

<sup>2</sup> The 1861 Boschke map and the 1888 Sanborn atlas depict no ell. The 1903 Sanborn atlas shows a one-story square-plan addition, but that may have been an error, as no such structure appears in the 1894 Hopkins atlas or the 1907 Baist.



All partitions would be taken out, including one north-south wall that is probably load-bearing, likely supporting the roof, if nothing else. This wall aligns on every level and attaches to the center chimney—which would also be demolished, at least below the roof.<sup>3</sup> The proposed front elevations depict a chimney top still in place, but the side elevation and sections do not.

Nearly a quarter of the north wall of the house would be removed on the first and second floors, not merely to create a circulation connection between 1212 and 1214, but to create broader views from one building into the other.<sup>4</sup> In fact, there would be no direct connection between 1214 and the second floor of 1212, only a viewing aperture. There would be a doorway between the buildings at a stair landing three steps above 1212's first floor.

The house's existing stairs would be demolished. Because they are becoming a primary circulation path for a commercial building, they will be wider than the originals. The fact that the floors of the two buildings do not align means that the runs of the new stairs will be longer. This adds up to the removal of additional floor framing.

As this is a concept application, there are no detailed framing plans or framing-demolition plans. The back-to-front section drawing is not clear on what might be replacement framing, although it suggests that a basement ceiling may be suspended from existing first-floor framing in the house. The floor heights within the historic main block of 1212 28<sup>th</sup> appear to remain the same, but with the level of intervention proposed, it is hard to say how much of the floor assemblies might remain at the end of the project.

### **Subdivision?**

The applicant does not presently propose to consolidate by subdivision the two lots upon which 1212 and 1214 28<sup>th</sup> Street stand. The combination of the two buildings is instead proposed to be effected pursuant to Section 106.6.2 of the building code, which allows openings in exterior walls closer than five feet from interior lots lines by covenant. This provision seems to be intended principally to address openings that are near an adjoining building, yet it references Section 705.8.7, which contemplates the approval of “a limited number of door openings between two abutting buildings” (but not all of the presently proposed openings are doors).

HPO has recommended that the applicant consult with the Office of the Zoning Administrator as to whether a covenant will suffice for the purposes of zoning clearance. HPO has also noticed this case as a potential subdivision, in the event that a subdivision is necessary.

### **Evaluation**

A sizeable rear addition should be supported by the Board, especially in a context where the buildings are commercially zoned and thus, generally deeper and hemmed in by neighboring structures. The size and appearance of the proposed addition has little effect upon the public appearance of the historic district, as suggested by the CFA's conclusion. And it is not especially out of balance with the size of the main block—if the main block were retained to a greater degree.

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<sup>3</sup> There is a similar wall in the center of the mirror-twin 1210 28<sup>th</sup> Street.

<sup>4</sup> The drawings suggest that 1212 28<sup>th</sup> Street has no north wall, or rather that the wall between the two buildings stands entirely within the 1214 28<sup>th</sup> lot. Its location relative to the property may be accurate, but the original 1212 wall must abut or form part of that of 1214, because 1212 is older than 1214, and even older than the house that preceded the garage. A bit of the side wall of 1212 is exposed where the “mansard” of 1214 rakes back and, of course, the side wall would have been necessary to support the house's framing for almost 160 years.

It is the proposed and implied demolition that is the preservation issue here. The preservation law defines demolition as “the razing or destruction, entirely or in significant part, of a building or structure,” and focuses on the removal of exposed exterior walls, but it does not exclude the consideration of the removal of other elements together as constituting substantial demolition. In fact, the preservation regulations (10C DCMR § 305) detail further the work that may be considered demolition under the law:

- (a) The removal or destruction of any façade;
- (b) The removal or destruction of all or a substantial portion of the structural components of the building, such as structural walls, floor assemblies, and roofs;
- (c) The removal or destruction of all or a substantial portion of the roof along with all or substantially all of one or more exterior walls;
- (d) The removal or destruction of all or substantially all of an entire wing or appendage of the building, such as a rear ell, unless the wing lacks physical or historic integrity, or is not a character-defining feature;
- (e) The removal or destruction of a substantial portion that includes character-defining features of the building or structure;
- (f) The removal or destruction of all or a substantial portion of a designated interior landmark, unless the elements to be removed lack physical or historic integrity, or are not character-defining features; or
- (g) Any removal or destruction requiring a partial demolition or raze permit under the D.C. Construction Code, including any demolition of non-bearing walls, interior finishes, or other interior non-bearing elements within a building where an interior space has been designated as a historic landmark.

The regulations go on to say that “the determination whether a proposal involves destruction of a building ‘in significant part’ shall depend on the extent to which character-defining historic features, historic or structural integrity, historic materials, or ability to convey historic significance would be lost.”

Among the purposes of the preservation law are, with respect to properties in historic districts, “[t]o retain and enhance those properties which contribute to the character of the historic district and to encourage their adaptation for current use.” Retention means, at the very least, that buildings are left substantially present, rather than substantially demolished, and to that end, among others, “alterations of existing structures are [to be] compatible with the character of the historic district.”

Retaining half the façade and most of the side walls, half the roof, and some of the floor framing is not insignificant. But neither is the loss of the rear wall, the other half of the roof, sizeable portions of a side wall, the chimney, a probable bearing wall in the center of the house, and an as-yet unknown extent of the floor assemblies insignificant or insubstantial. It is too much demolition to sufficiently retain the historic or structural integrity of the house and its character, putting it too close to being merely a façade. The gabled roof form, for instance, is an important character-defining feature, and it can be retained while adding a large addition, as was done at 1210 next door.

The 12.5- by 34-foot house makes up a relatively small portion of the whole complex, especially as it is proposed to be expanded. It is not very efficient to join it directly to the former garage next door, because of the disparate floor levels. Yet the former garage, not nearly as old as the

house, and having been a wider and originally open-plan structure, thoroughly altered outside and in, is the more logical place to carry out the greater part of the interior alterations that could better connect the two. The proposed rear addition offers another opportunity.

Connections between the buildings should be permitted if the openings are minimized.

A large addition can be sufficiently compatible, but the addition should be located entirely behind the house, in order to preserve the little main block. Adding on as proposed also adversely affects the house's original massing. It is most compatible to add beneath the rear eave, so that the addition is subordinate and does not harm the roof itself, although alternatives may be considered.

**Recommendation**

*HPO recommends that the Board not approve the concept as proposed, because it does not sufficiently retain the fabric and character of the contributing building at 1212 28<sup>th</sup> Street and is therefore inconsistent with the purposes of the preservation law.*