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

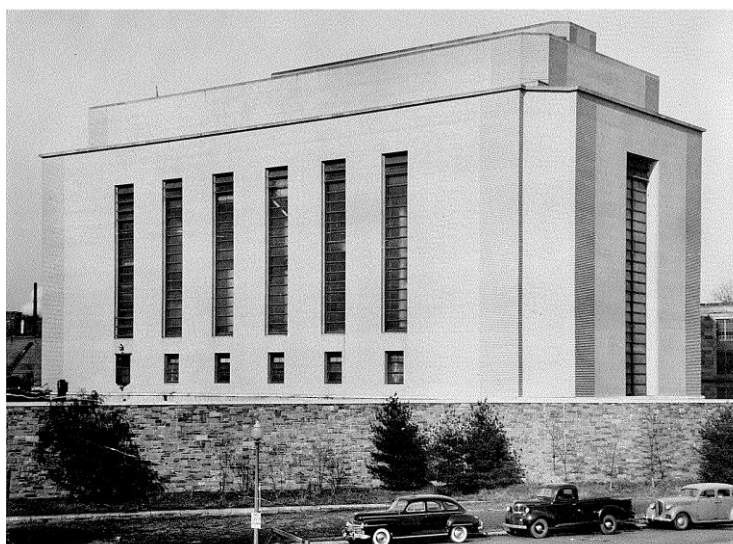
Landmark/District: **Georgetown Historic District** (x) Agenda
Address: **1051/1055 29th Street NW (West Heating Plant)**

Meeting Date: **November 2/December 21, 2017** (x) Concept design
Case Number: **17-263** (x) Demolition
(x) New construction
(x) Site alterations

The applicant, property owner Georgetown 29K Acquisition LLC, requests the Board’s review of a concept application to redevelop the West Heating Plant. The project involves preservation of the street façade, replacement of most of the building with new construction, and creation of a public park on a portion of the property.

West Heating Plant

The West Heating Plant is a prominent Art-Moderne building constructed between 1943 and 1948; it was designed by William Dewey Foster with the leadership of Gilbert Stanley Underwood of the Public Works Administration, precursor to the U.S. General Services Administration. With its heroic massing and abstracted detailing, the building is exemplary of the aspirational public architecture of the late-New Deal era, and is the most expressive of its kind in Washington. It is also a contributing structure within the Georgetown Historic District, and the last in a series of large-scale industrial buildings associated with the Georgetown waterfront. Historic photographs of the heating plant help to convey its architectural character when new.



Historic view from of the West Heating Plant as seen from the city

Background

The West Heating Plant is subject to several historic preservation and design review authorities, and this is the first opportunity for the Board to consider the project. As the property is in Georgetown and adjacent to protected federal land, it is subject to review by both the U.S. Commission of Fine Arts and the Historic Preservation Review Board. In addition, there is a federal historic and cultural preservation covenant in the deed that requires the property to be treated in accordance with the historic preservation standards and guidelines established by the Secretary of the Interior.

Given the procedural complexity of these overlapping jurisdictions, the Office of Planning (OP) established a process for the applicant to follow in reconciling the multiple reviews and seeking approvals for the project. Once the Commission of Fine Arts and Review Board have given their recommendations to the Director of the Office of Planning in his capacity as the Mayor's Agent under the District's preservation law, the Mayor's Agent's hearing officer will hold a public hearing and make recommended determinations. The Director will then issue a final decision, including guidance to the State Historic Preservation Officer on issues relevant to the covenant.

Commission of Fine Arts Review

The project is subject to review by the U.S. Commission of Fine Arts under the Old Georgetown Act and Shipstead-Luce Act.¹ The applicant first submitted the project to the Commission in 2013, and it has been under the Commission's review since then. This has involved work with the staff as well as presentations to the Commission and its Old Georgetown Board. In several reviews, including most recently in May 2017, the Old Georgetown Board consistently recommended a design concept that rehabilitates the building in accordance with preservation standards.

The Commission of Fine Arts did not adopt the Old Georgetown Board's recommendation in May 2017, but approved the concept with recommendations. Recognizing that the project is fundamentally a new building, the Commission suggested a more creative and innovative design that would interpret the historic building's character less literally. After revising the concept in response, the applicant returned to the Commission for an endorsement in September 2017, and then requested referral to the Review Board.

DC Historic Preservation Law Review

Concurrently with the Fine Arts review, the Office of Planning (OP) has engaged with the applicant to promote coordination with the review process under the District's historic preservation law. Historic Preservation Office (HPO) and other OP staff met six times with the applicants and their design team between May 2016 and February 2017 to provide feedback on the proposal, discuss the types of questions they might receive from the Old Georgetown Board, Historic Preservation Review Board, and Mayor's Agent, and encourage them to consider how

¹ The heating plant is a contributing building in the Georgetown Historic District. The Shipstead-Luce Act gives the Commission authority to review the impact of the project design on Rock Creek and Potomac Parkway, which abuts the site. The Commission is not a historic preservation review body, but sends its advisory recommendations to the District of Columbia for consideration.

their project could better respond to the preservation standards under which it would be evaluated.

During this process, OP staff attempted to assist the applicants by identifying important design characteristics and specific features of the building that they should consider retaining or reconstructing to preserve the building's essential character, even if they felt that meeting the Secretary of the Interior's Standards was not feasible. Through this series of meetings, the applicants revised the project to retain the building's stone base, the distinctive rusticated detailing at the corners, and the proportions and rhythm of window openings to the walls. The revision responded to OP's recommendation to retain the muscularity and heft of the heating plant's architectural expression, and included an evocation of the penthouse to retain the distinctive roof profile. This was the concept submitted to CFA for review in May 2017.

Historic Preservation Covenant

In addition to the Review Board and Fine Arts procedures, the heating plant is subject to a historic and cultural preservation covenant resulting from the Section 106 review process under the National Historic Preservation Act. Although the project's compliance with the covenant is not before the Review Board, we mention it to provide a full picture of the reviews to which the project is subject. The General Services Administration placed the covenant in the deed of sale to protect the historic character of the property after its transfer out of federal government ownership. Such covenants are a typical mechanism used by federal agencies to ensure that protections equivalent to those provided under federal law remain in place through a legally enforceable mechanism after transfer to a private entity. The covenant allows the agency to fulfill its historic preservation obligations under federal law.

The West Heating Plant covenant is included as Attachment 1 (see page 13). It requires that any construction on the West Heating Plant property be consistent with the recommended approaches in the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating Historic Buildings*. This 240-page document is available at www.nps.gov/tps/standards.htm.²

Application of the Secretary's Standards

The Secretary of the Interior's Standards for Rehabilitation are included in the District's historic preservation regulations (DCMR 10-C § 2003), which note that the Board and HPO staff may apply the standards in project review. The regulations state that rehabilitation meeting the Secretary's Standards is considered compatible with the character of historic properties.

Secretary of the Interior's Standards and Guidelines

The Secretary's Standards for treating historic properties are nationally used historic preservation principles stated in non-technical language. They express basic concepts about maintaining, repairing, and replacing historic materials, as well as making alterations and designing new additions.

² The covenant cites the Standards and Guidelines "as the same may be amended from time to time." The most recent version, dated 2017, is cited in this report.

The Guidelines accompanying the Standards offer design and technical recommendations to assist in applying the Standards to specific property. Together, they provide a framework to guide decisions about managing and sustaining historic property. They are applied to all types of historic buildings and building conditions, and address both exterior and interior issues, as well as site and landscape features, and related new construction.

The Standards offer four distinct approaches to the treatment of historic properties—preservation, rehabilitation, restoration, and reconstruction, with guidelines for each. Elements of all four treatment approaches may apply to aspects of the West Heating Plant project, but the most pertinent treatment is rehabilitation.

Standards for Rehabilitation

The following ten principles comprise the Secretary's Standards for Rehabilitation:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Guidelines for Rehabilitating Historic Buildings

The Secretary's Rehabilitation Guidelines are much more detailed than the Standards, running to nearly ninety illustrated pages in the printed document. The Guidelines begin with an introduction on what distinguishes rehabilitation from other preservation treatments:

In Rehabilitation, historic building materials and character-defining features are protected and maintained as they are in the treatment Preservation. However, greater latitude is given in the Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings to replace extensively deteriorated, damaged, or missing features using either the same material or compatible substitute materials. Of the four treatments, only Rehabilitation allows alterations and the construction of a new addition, if necessary for a continuing or new use for the historic building.

The Guidelines then describe a recommended sequence for determining appropriate building treatments:

Identify, Retain, and Preserve Historic Materials and Features: The guidance for the treatment Rehabilitation begins with recommendations to identify the form and detailing of those architectural materials and features that are important in defining the building's historic character and which must be retained to preserve that character. Therefore, guidance on identifying, retaining, and preserving character-defining features is always given first.

Protect and Maintain Historic Materials and Features: After identifying those materials and features that are important and must be retained in the process of Rehabilitation work, then protecting and maintaining them are addressed. Protection generally involves the least degree of intervention and is preparatory to other work. Protection includes the maintenance of historic materials and features as well as ensuring that the property is protected before and during rehabilitation work. A historic building undergoing rehabilitation will often require more extensive work. Thus, an overall evaluation of its physical condition should always begin at this level.

Repair Historic Materials and Features: Next, when the physical condition of character-defining materials and features warrants additional work, repairing is recommended. Rehabilitation guidance for the repair of historic materials, such as masonry, again begins with the least degree of intervention possible. In rehabilitation, repairing also includes the limited replacement in kind or with a compatible substitute material of extensively deteriorated or missing components of features when there are surviving prototypes features that can be substantiated by documentary and physical evidence. Although using the same kind of material is always the preferred option, a substitute material may be an acceptable alternative if the form, design, and scale, as well as the substitute material itself, can effectively replicate the appearance of the remaining features.

Replace Deteriorated Historic Materials and Features: Following repair in the hierarchy, Rehabilitation guidance is provided for replacing an entire character-defining feature with new material because the level of deterioration or damage of materials precludes repair. If the missing feature is character defining or if it is critical to the survival of the building (e.g., a roof), it should be replaced to match the historic feature based on physical or historic documentation of its form and detailing. As with repair, the preferred option is always replacement of the entire feature in kind (i.e., with the same material, such as wood for wood). However, when this is not feasible, a compatible substitute material that can reproduce the overall appearance of the historic material may be considered. It should be noted that, while the National Park Service guidelines recommend the replacement of an entire character-defining feature that is

extensively deteriorated, the guidelines never recommend removal and replacement with new material of a feature that could reasonably be repaired and, thus, preserved.

After this introduction, the guidelines specify treatments that are recommended, or not recommended, for various building components: masonry, wood, metals, roofs, windows, entrances and porches, storefronts, curtain walls, structural systems, mechanical systems, and interior spaces, features, and finishes. The final sections address the building site, neighborhood setting, code-required work, resilience, and new additions.

Evaluation of Proposed Design Approach and Preservation Plan

The applicant's submission includes an introductory description by preservation consultant EHT Traceries, entitled "West Heating Plant: Existing Conditions, Design Approach & Preservation Plan Report Abstract" (Attachment 2). This abstract presents the applicant's strategy for dealing with its central claim about the building, namely that deteriorated conditions and hazardous materials mean that most of the facades cannot be preserved. The report outlines the preservation and design approach taken in response to that claim:

With these constraints in mind, the developers and design team were tasked with finding a solution that would preserve what can be preserved, and would honor what could not. While most of the WHP cannot be preserved, that which is will rigorously follow the Secretary of the Interior's Standards for the Treatment of Historic Properties. Furthermore, to the extent feasible, the development team seeks [to] salvage and incorporate pieces of the heating plant equipment as art either in the building's public spaces or in the public park. Upon receiving CFA's encouragement to be "even more creative in terms of the way you would interpret the original building," the design team has created a scheme that draws inspiration from the energy, water, and construction technologies incorporated into the WHP's original design and operations. The design, which features a residential building and public park, celebrates, incorporates, and modernizes the technologies that were inherent to this twentieth-century industrial site.

Rather than rebuild a literal replica of the existing structure, an approach not supported by the Secretary of the Interior's Standards for Treatment of Historic Resources ("Secretary's Standards"), a design inspired by the unique truss frame of the heating plant and the industrial memory of the structure and site has been proposed. This report offers a framework for an understanding and evaluation of this design for both the building and park.

This statement is not only inaccurate in part,³ but it is also not consistent with the methodology of the Secretary's Standards, which is described in detail above and in summary as follows:

- First, identify character-defining features;
- Protect and maintain those features;
- Then if necessary, repair with the least degree of intervention possible, including limited replacement in kind;
- And finally, if damage precludes repair, replace an entire character-defining feature in kind.

³ One of the four sections of Secretary's Standards addresses reconstruction of historic structures in appropriate circumstances. The section is illustrated by seven historically accurate "literal" replicas, including the 1949 reconstruction of the McLean House at Appomattox (based on measured drawings of the original), the 1964 reconstruction of San Francisco's Palace of Fine Arts (built of temporary materials in 1915), and the recent reconstruction of an 1890 Lake Pontchartrain lighthouse destroyed by Hurricane Katrina.

This methodology applies equally to building elements that can be preserved and those that cannot be repaired.

The applicant contends that deterioration and contamination of the brick facades and structural steel frame require their demolition. This condition can be evaluated under the Secretary's Standards and Guidelines. First, the structural steel framing is mostly hidden from view, so necessary structural repairs and modification can be made. The facades, however, have been identified as character-defining features of the exterior, which include the buff-colored brick; large expanses of smooth, unadorned wall surfaces; ornamental use of brick on building corners; stone veneer on the basement/watertable; vertical bands of metal-sash industrial windows; rounded, streamlined corners framing central window on west façade; the stepped flat roof; and other elements.⁴

For deteriorated brick facades, the Rehabilitation Guidelines recommend:

Replacing in kind an entire masonry feature that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples can include large sections of a wall, a cornice, pier, or parapet. If using the same kind of material is not feasible, then a compatible substitute material may be considered.

Treatments that are *not* recommended include:

Removing a masonry feature that is unreparable and not replacing it, or replacing it with a new feature that does not match.

Using substitute material for the replacement that does not convey the same appearance of the surviving components of the masonry feature.

Creating an inaccurate appearance because the replacement for the missing masonry feature is based upon insufficient physical or historic documentation, is not a compatible design, or because the feature to be replaced did not coexist with the features currently on the building.

In general, the applicant's concept design does not follow the recommended treatment, but instead reflects the three treatments that are not recommended. This is not consistent with the Standards and Guidelines.

In one respect, however, the concept design does follow the treatment recommendations, by retaining the west-facing street façade with its corner returns. The concept proposal is unclear on how much of the street façade would be retained intact and how much replaced in kind, but if its retention is possible, then similar solutions could be explored for other facades. This was an aim of the process that OP undertook with the applicant in 2016 and 2017, in seeking to encourage a design approach that would achieve development goals while reducing preservation conflicts. The concept developed after discussions with the OP staff and presented to the Commission of Fine Arts last May included a reconstruction of the east facade, albeit with a widened window bay, as well as the north and south facades, retaining much of their configuration in terms of the monumental window bays and contrasting plain brick panels. OP supported the applicant's

⁴ See GSA's 2012 Determination of Eligibility.

progress in its comments to the Commission in May, and continues to encourage further advancement along this positive path.

Illustrative Comparisons

Numerous examples here in Washington illustrate successful application of the treatments recommended in the Secretary's Standards for severely deteriorated historic buildings. Some of these projects came about not just from condition issues, but all demonstrate the feasibility of the repair, replacement, and reconstruction techniques discussed in the Standards and Guidelines. Perhaps most notably, in the 1980s and 90s, the Pennsylvania Avenue Development Corporation oversaw a historic preservation program that addressed the twin challenges of historic building deterioration and mandated redevelopment within a historic area. Private developers have sponsored similar projects. Many of these examples involved technically demanding reconstructions of ornamented facades, either through complete disassembly and reassembly of the historic materials in the same location, or using a combination of historic and new materials (see Attachment 3).

Summary

As noted above, the Secretary's Standards and Guidelines for Rehabilitation are distinguishable from other preservation standards in giving greater latitude to replace extensively deteriorated, damaged, or missing features using either the same material or compatible substitute materials. The clear preference is for preservation and repair, but ultimately, if the preferable methods are not possible, the Standards and Guidelines allow the kind of accurate replacement and reconstruction that the applicant's concept design submissions show to be possible, though not yet achieved in the versions submitted. They do not give unlimited latitude to design from scratch when building systems are extensively deteriorated.

The applicant's desire to salvage and incorporate pieces of the heating plant equipment on site as art is admirable, as is drawing inspiration from the energy, water, and construction technologies reflected in the historic plant. The aesthetic recommendation of the Commission of Fine Arts to be "even more creative" in interpreting the original building is also understandable, but none of these worthy objectives supersede the obligation to follow the preservation standards applied to the property.

Window Issues

All of the conceptual designs the applicant has put forth so far have been premised on substantial demolition of the structure, except for retention of the building base. The concepts have also increased the proportion of windows to wall surface in the reconstructed facades. This is beneficial for residential use of the structure, especially high-end residential units, to which large expanses of glass and a prime riverfront view add significant value. Other residential concepts and other potential reuses could be less dependent on expansive windows for wide-open views.

The applicant is faced with the task of formulating a project within the rules and guidance established by GSA in the property auction. That guidance included comments from the Office of Planning on questions that had been raised by potential bidders (see Attachment 4). Part of these comments addressed windows:

GSA's determination that the property is individually eligible for listing on the National Register of Historic Places and its requirement to apply the Secretary of the Interior's Standards for Rehabilitation suggest that layouts for residential or other use should rely on the natural light provided by the existing character-defining 9-foot-wide window panels that run nearly the full height of the building, without introducing new openings into the contrasting solid wall panels that are also character-defining features of the building. The opportunity may exist for additional openings behind the parapet at the sixth floor level, at the basement level facing the coal yard, and in the roof to allow skylights in a manner that would not affect important characteristics of the building. Since the National Park Service applies the same standards for reviewing projects for certified rehabilitation, this approach would appear to maintain consistency with the requirements that apply for obtaining the federal rehabilitation tax credit.

While the Secretary's Standards may limit the benefit of more windows, they do not deprive the applicant of reasonable beneficial use of the property. Many historic industrial buildings have been converted successfully to residential and other uses here and elsewhere. The Historic Preservation Office is prepared to continue working with the applicant to achieve a similarly successful rehabilitation of the West Heating Plant.

Review of Concept Design Components

The applicant's design concept is illustrated in the extensive booklet of plans submitted with the application. The plans are the same as those submitted to the Commission of Fine Arts for its September 2017 review.

Demolition

The plans call for demolition of most of the building: nearly all of the supporting structure, all of the roof and penthouses, and at least 80 percent of the exterior walls, including the east façade facing Rock Creek and Potomac Parkway and the city. It appears that the main floor is to be removed as well, as the proposed ground-floor height would be lowered to the sidewalk grade.

What would remain is most of the 29th Street façade—the steel structure and its exterior brick wall, returning eleven feet around the north and south sides to retain the character-defining “streamlining” of projecting brick at the corner. In addition, the applicant proposes to retain part of the stone-faced base.⁵

Without access to an engineering expert, the Historic Preservation Office must rely on the technical reports prepared by the applicant's engineer and the peer review engineer brought in at the request of the Commission of Fine Arts. The engineering experts concur that there are significant structural concerns with the building, but differ on the extent of intervention necessary for repair. One of the tasks facing the Mayor's Agent's hearing officer will be to weigh the testimony on this question and issue pertinent findings.

Whatever the extent of deterioration in the brick facades, the District's historic preservation design guidelines for walls and foundations follow a similar approach to the Secretary's Standards, recommending repair as the first option, and in-kind replacement as needed:

⁵ This is necessary for approval to rebuild to the existing height.

Consideration should first be given to repairing only those areas needing attention, using in-kind materials; in other words, using the same types of materials as the existing. If deterioration is extensive, replacing the entire wall or foundation may be required. If this is necessary, the owner should first investigate the feasibility of replacing it in-kind. Only after in-kind replacement has been shown not to be economically or technically feasible, should the owner consider replacing the wall or foundation in a substitute material that is chemically and physically compatible with adjacent materials and is similar in appearance to the existing material.⁶

The proposed demolition does not retain the historic structure, and thus is not consistent with the purposes of the District's historic preservation law.

New Construction

The proposed replacement building approximates the 110-foot height of the heating plant, with penthouses above that height. Its massing is similar to the existing, but without the chamfered corners that add vertical emphasis to the east end of the heating plant. A two-step penthouse also reflects the existing configuration.

Unlike the heating plant, the new facades are fully glazed, with a wickerwork of moveable bronze-colored sunscreens outboard of the windows, along the plane of the existing facades. Crisscross bracing visible behind the sunscreens recalls the heating plant's internal structure. On the east side of the building, balconies overlook Rock Creek on each floor, with balustrade enclosures in the same vocabulary as the sunscreens.

The historic 29th Street façade is retained or reconstructed in kind, but at its ground floor, a large horizontal slice of the brick and stone is removed for the insertion of a steel I-beam that supports the wall above and allows for a ribbon of windows below. This beam continues as a cap along the length of the 29th Street stone wall.

Site Work

The southern half of the square is proposed to be an enclosed park, in an area designated for open space in the Comprehensive Plan. The park would occupy the roof of a parking garage entered at ground level. The property would also be connected by a landscaped path and bridge to National Park Service land on the opposite side of the Chesapeake and Ohio Canal.

The park design extends the spirit of the architectural design into the landscape, creating a unified composition. Some ideas, such as the continuous I-beam and pergola atop the site wall on 29th Street, do not appear compatible with the historic property or district, and should be reconsidered. Otherwise, the concept design for the park does not raise consequential historic preservation issues.

Analysis

The Office of Planning continues to recommend rehabilitation as the appropriate approach for the heating plant, with reconstruction limited to what is necessary to achieve rehabilitation. This approach has the advantage of historic authenticity, reusing a structure that embodies the legacy

⁶ Office of Planning, *District of Columbia Historic Preservation Guidelines: Walls and Foundations of Historic Buildings*.

of the New Deal era and Georgetown industry in its heroic scale and mid-century architectural modernity. New construction at the same scale lacks that advantage, making it difficult to maintain compatibility with the character of the historic surroundings.

Adaptive use of the heating plant would use the full volume of the existing building, but if the building is demolished, review of new construction under the preservation law would involve applying the Board's guidelines for compatibility. The Board's guidelines for new construction state:

While a new building does not necessarily need to be exactly the same height as its neighbors to be compatible, it should be designed to respect existing building heights. For example, a new five-story building in a block of two- and three-story buildings usually detracts from the character of a street. Similarly, a new one-story building in a block of four- or five-story buildings will be out of character.⁷

The site's closest historic buildings are a two-story warehouse (built 1926) and two-story rowhouses (built 1875) across the street. Its other neighbors are non-contributing modern buildings that top out at about 70 feet and are often broken up with setbacks above lower wings. New construction that is significantly higher would need to address the issue of compatibility with the historic district.

Putting aside the issue of height, the proposed facades are executed with sophistication and flair. The inspiration from steel construction technology is evident; in addition to the I-beam along the street façade, the bronze-colored metal screens contribute to this expression (see pages 88 and 89 of the plans).

Although the horizontal strips forming the screens could be seen as extensions of the streamlining motif in the old brick corners, otherwise the joined façades are very different. Where the heating plant is expressed as a sculpted brick volume, the new building exhibits a textural veil enclosing a glass box. The heating plant façades are dominated by alternating panels of brick and glass, strongly vertical in expression, with the windows set in shadowed recesses that emphasize the massive brick walls.⁸ The new façades are a more neutral grid of square elements, with neither vertical nor horizontal dominating, except on the east façade. The metal screens and glass skin de-emphasize solidity as the dominant building image. Instead, visual interest is suggested in the accidental patterns created by the moveable screens. Similarly, at night, the dark-colored metal wickerwork allows changing window lighting to express the architectural character (see page 93).

Visual contrast can be invigorating, but the design concept is constrained by the attempt to honor the historic building in the new one, which compromises the benefits of each approach. The architectural character of the heating plant comes from not from its structural framing, which is entirely hidden from public view, but from the expressive strength of the massive brick walls and soaring industrial windows. Replacing most of the historic facades with an evocation of the underlying structure does not retain the historic building's architectural integrity.

⁷ Office of Planning, *District of Columbia Historic Preservation Guidelines: New Construction in Historic Districts*.

⁸ In current photographs of the building, the recessed windows are obscured by non-historic window screens that visually flatten the north and south facades.

Conversely, the attachment of the new design to the historic street façade frames one side of an otherwise balanced composition, but not the other side facing the city. Boxed in by a pre-determined massing, the proposed new east façade is ponderous and horizontal in comparison to the historic original, with its combination of corner chamfers and stepped penthouses that combine to accentuate a vertical expression.

If the Mayor's Agent determines that the historic building does not have to be preserved, a new design would be improved by freedom from artificial constraints with limited historic preservation value. As a modern building, it would need to be compatible with the historic district in scale, massing, and architectural expression.

Recommendation

HPO recommends that the Board adopt the following recommendations:

- *The project would not retain the historic building, and is thus not consistent with the purposes of the historic preservation law;*
- *The concept design does not follow the recommended approaches in the Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for Rehabilitating Historic Buildings;*
- *The concept design shows that repair, or if necessary, in-kind reconstruction of the brick facades is a technically feasible response to irreparable deterioration;*
- *The proposed concept attempts a compromise that is architecturally unconvincing and does not achieve meaningful historic preservation; and*
- *For a proposed concept that is almost entirely new construction, the applicant needs to resolve how the 110-foot height is consistent with the Board's guidelines for compatibility with the Georgetown Historic District.*