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

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Landmark/District: **Saint Elizabeths Hospital Historic District**  
Address: **1110 Oak Drive SE** (x) Denial calendar  
Meeting Date: **July 27, 2023** (x) Raze  
Case Number: **23-379** (x) Permit

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The applicant, STE Parcel 15 LLC, agent for property owner the District of Columbia (Office of the Deputy Mayor for Planning and Economic Development), requests the Board's review of a permit application to raze Buildings 115 and 116, identified as buildings contributing to the character of the Saint Elizabeths Hospital Historic District in the 1979 nomination to the National Register of Historic Places, the 1990 National Historic Landmark designation, and the 2005 local historic district designation. The buildings are proposed for demolition to make way for a large, mixed-use complex whose conceptual drawings the Board reviewed in April.

Buildings 115 and 116 (earlier known as East Side No. 8 and East Side No. 7, Noyes No. 8 and Noyes No. 7, and CT-8 and CT-7) were an expansion of the adjacent, seven-building Continuing Treatment complex, begun a decade earlier, and so they resemble those structures.<sup>1</sup> They were completed in 1943, connected to each other by a corridor and reflecting wartime demand for additional long-term residential/treatment facilities. A perpetuation of the "cottage" architecture commenced on the West Campus in the late nineteenth century, these are nonetheless major edifices. They mark the end of the campus's period of significance as established by the 1994 National Historic Landmark designation and confirmed by the 2005 local designation.

The buildings have been long vacant, but they plainly retain their historic integrity, despite some deterioration and the removal of many of the original roof tiles.

The 2012 campus master plan proposed the demolition of the two buildings for mixed-use development. According to the HPO staff report on the plan,

Demolitions of contributing buildings are by definition contrary to the purposes of the city's preservation law. Any raze of a contributing building would have to be reviewed by the Board and the Mayor's Agent once application is made... to construct a replacement building. Clearance of the raze application would be contingent on a finding by the Mayor's Agent that the demolition [is] necessary in the public interest or that failure to issue the raze would result in an unreasonable economic hardship.

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<sup>1</sup> The slightly older Continuing Treatment Quadrangle has recently been rehabilitated for housing, suggesting that reuse is feasible from a practical and economic point of view.

With regard to demolitions, the District of Columbia’s historic preservation law states that “No permit shall be issued unless the Mayor finds that issuance of the permit is necessary in the public interest, or that failure to issue a permit will result in unreasonable economic hardship to the owner.” (D.C. Code § 6-1104(e)) The destruction of a historic building is not consistent with the purposes of the law, because it does not “retain and enhance those properties which contribute to the character of the historic district” nor does it “encourage their adaptation for reuse.” (D.C. Code § 6-1101(b)(1)(A)) Thus, the Board cannot approve the demolition of Buildings 115 and 116. The Board may comment upon the compatibility of the associated new-construction project and the qualities of the architecture and planning.

The historic preservation regulations allow for the Board to recommend denial of an application which clearly does not meet the Board’s written standards, based upon the applicant’s materials and the staff report, without testimony. (10C DCMR §§ 328)

The Mayor’s Agent may apply other standards beyond the scope of the Board’s review. Ultimately, demolition of contributing buildings may be found “necessary in the public interest” if it is “necessary to allow the construction of a project of special merit.” A project of special merit is one that offers significant benefits to the District or to the community by virtue of exemplary architecture, specific features of land planning, or social or other benefits having a high priority for community services. (D.C. Code § 6-1102(11))

**Recommendation**

*HPO recommends that the Board recommend denial of a permit to raze the contributing buildings as inconsistent with the purposes of the preservation law.*



*Top: Building 116. Bottom: Building 115 and, at right, the corridor connecting the buildings.*

