

Comments Received on the DC Historic Preservation Plan 2016

Topic	Organization or Person	Comment
		(Note: Comments have been organized according topic area, following the layout of the Plan document. The text of comment letters has been divided so that all comments on the same topic appear together. Editorial comments are not included.)
		GENERAL COMMENTS ON THE PLAN
	ANC 2B	<p>Whereas, the Historic Preservation Office (HPO) has released a draft “2016 District of Columbia Historic Preservation Plan: Enriching Our Heritage” and seeks public comment;</p> <p>Whereas, ANC 2B recognizes the effort that went into the draft plan and commends the HPO on its work;</p> <p>Whereas, ANC 2B includes parts of 5 historic districts and numerous designated historic landmarks, and thus deals regularly with the Historic Preservation Review Board (HPRB) and the HPO;</p> <p>Whereas, ANC 2B agrees with the draft report that “some of the [HPRB/HPO] systems are rusty,” that the HPRB/HPO “communications are not up to par,” and that the HPRB/HPO “need[s] to strengthen and reinvigorate . . . partnerships,” especially with respect to ANCs;</p> <p>Therefore be it resolved that ANC 2B requests that the draft plan be revised to address explicitly the following points: [see comments below]</p>
	ANC 6B	<p>ANC 6B comprises the southeast portion of Capitol Hill and includes a large portion of the Capitol Hill Historic District. Our monthly meetings typically consist of a number of historic preservation cases and we frequently work with HPO staff.</p> <p>The commission appreciates the significant time and effort that HPO put into drafting the plan. The document is extremely thorough, and includes a helpful timeline of the city’s preservation history along with recommendations on how HPO and the Historic Preservation Review Board can better achieve the goal of preserving our city’s historic structures.</p> <p>ANC 6B also appreciates this opportunity to provide comments on the office’s four year draft preservation plan. The following sections highlight key recommendations that we agree with along with suggested additions to the plan.</p> <p>We also want to acknowledge our excellent working relationship with HPO staff, a group we find to be extremely responsive, knowledgeable and supportive on cases related to the Capitol Hill Historic District. We look forward to working with HPO and the HPRB in the years ahead to help the city achieve its preservation goals.</p>
	Capitol Hill Restoration Society	<p>We appreciate the opportunity to review and offer comments on this draft plan, which will guide the city’s preservation efforts for the next four years. We also appreciate that this step is seen as the beginning of input from the public regarding the four-year plan, and that HPO and HPRB will be welcoming feedback throughout the life of the plan. Putting up front the Comprehensive Plan’s vision for stewardship of DC’s heritage gives the 2016 Plan a solid footing for all that follows and grounds the specific goals and objectives in one overarching goal: to preserve and enhance the city’s unique cultural heritage, beauty, and identity by respecting its historic physical form and recognizing “the enduring value of its historic structures and places.”</p>
	Capitol Hill Restoration Society	<p>We commend the tremendous dedication and hard work that went into preparing this four-year plan and look forward to working with HPO during its implementation.</p>
	Citizens Planning Coalition	<p>There is no question that the 2016 Preservation Plan (draft) is a quantum step forward. The organization of the plan, including the history and heritage section with a timeline and historical overview, a section on preservation achievements (especially the</p>

		<p>style, quality, and innovativeness of the graphic presentation), and the section on preservation challenges are great additions to the plan's organization. Recognition of the need for "Ward Heritage Plans" in the face of the lack of a process for creating neighborhood or sector plans, where a systematic preservation element could be included, is another positive step.</p> <p>At the same time, while a definite "great leap forward" as a master plan document and approach, the Preservation Plan is not yet "masterful."</p> <p>While the section on preservation challenges is an improvement, the section (and therefore the plan) does not rise to the level of a systematic evaluation of the challenges, opportunities, processes, and approaches. It does not appear that such an evaluation of the city's preservation "system" was conducted as a part of the process of developing the plan.</p> <p>As a result, a goodly portion of the planning document feels idiosyncratic and some of the "really big issues and questions" aren't being asked and answered. For example:</p> <ul style="list-style-type: none"> • What is the purpose of historic preservation in the city, is it time for an assessment of preservation practice based on the 35 years of experience since the local law was passed?; • What gaps may exist in the processes, regulations, and practices?; • Would a "windshield level" evaluation of the involved advocacy organizations be a helpful addition to the plan, including an assessment of capacity development needs and asking the question of how to create a robust city-wide and neighborhood network of preservation organizations; • Would some comparisons to preservation practice in other jurisdictions have been helpful?; • The addition of case studies of particular preservation problems and issues (popups, Marc Fisher's writings, particularly about Mount Pleasant, failures to create historic districts, inability to restore art deco treatment to Brookland Shopping Center once the panels were uncovered during a renovation project, community opposition to landmark applications, specific demolition by neglect cases, RLUIPA cases, the incongruence between zoning height and mass maximums and architectural practices when pre-1950 DC neighborhoods were constructed, the Georgetown Apple Store debacle, etc.). <p>In short, a much deeper presentation of "current conditions," including an evaluation of all of HPO's publications and website, and a response, would contribute to a stronger plan.</p> <p>State of the historic preservation movement</p> <p><i>Pro.</i> Preservation is the city is at a crossroads. It is fair to argue that historic preservation has been incredibly successful, given the number of designated properties and historic districts, the popularity of historic building stock, the fact that the city is gaining population—in large part attracted to historic residential building stock and neighborhood commercial districts. But this success was based on the diligent efforts of residents willing to live in the city when trends did not favor urban living. In the face of the outmigration of residents and businesses, neighborhood preservations focused on stabilizing and staunching leakage, preserving neighborhoods in the face of municipal decline, and maintaining and enhancing these places in ways that kept them attractive and positioned for later success.</p> <p><i>Con.</i> On the other hand, despite the reality that preservationists "saved the city" during the many decades that trends did not favor urban living, in many quarters this fact is not recognized, and in fact preservation is denigrated and seen as a hindrance or millstone frequently in the way of "progress." The number of historic districts that have been created over the past 10 years has been minimal compared to the first 15 years since the National Historic Preservation Act passed.</p> <p>[continues at Negative Attitudes about Preservation below]</p>
	Citizens Planning Coalition	<p>Some recommendations/observations:</p> <ul style="list-style-type: none"> • a content analysis of media coverage would be useful;

		<ul style="list-style-type: none"> • there should be specific cultural interpretation and communications elements within the plan; • cemetery preservation issues could be better addressed; • transportation history issues could be better addressed; • Plan should include a workflow diagram of the various processes.
	Dupont Circle Conservancy	<p>The Dupont Circle Conservancy (DCC or the Conservancy) believes that the Historic Preservation Office (HPO) has done an excellent job drafting its 4-yearwork plan for the period 2013-2016. We single out chief David Maloney for his leadership in this work and for what we understand was his special role is writing Chapter 2, "A Legacy of Visionary Plans," and Kim Elliott for plan's the layout. The use of many historic and present-day images and photos, along with engaging graphics and tables, adds to the value of this statement. We see Chapter 2, along with Chapter 4, "What we Heard from our Constituents," as creating an essential plan baseline if historic preservation is to continue its important and integrated role as a major driver in the growth and development of the District of Columbia.</p>
	Southwest Neighborhood Association	<p>The Southwest Neighborhood Assembly, Inc. believes Enriching our Heritage, 2016 Draft DC Historic Preservation Plan (Plan) is a well-reasoned document.</p> <p>Due to prevailing development pressures, Near Southwest is one of the fastest changing communities. The Southwest Neighborhood Assembly has been working to document, promote and provide forums for the necessary conversations. We've prepared or supported historic nominations, some of which the Historic Preservation Review Board has already approved, including Tiber Island and Harbour Square. We're currently holding a lecture series that brings architects, professors and city planners into dialogue with the community. But we cannot do it alone.</p> <p>The Plan's four overarching goals are precisely what the city needs. Indeed, our experience in Southwest has demonstrated that we need a political process that recognizes historic resources on a timely basis, promotes an understanding of our histories, protects historic properties, and plans for our heritage.</p> <p>When historic resources aren't promptly documented or appropriately promoted, it risks the development of our community and can irrevocably destroy our cultural heritage. And with tourism as the city's second-largest industry, we believe the city's interest is intricately tied to our cultural heritage.</p> <p>We support the Historic Preservation Office's Plan and we pledge to further its goals by being a proactive partner in preserving Southwest, DC.</p>
	David Alpert, Greater Greater Washington	<p>The DC Historic Preservation Office (HPO) has released a new plan for preservation through 2016. From conversations with preservationists and the public, HPO concluded that "preservation has a perception problem," which it wants to combat. However, perception isn't the only problem.</p> <p>Most of the challenges the preservation office says they heard are about communication:</p> <ul style="list-style-type: none"> • "Preservation has a perception problem" • "Many residents have no understanding or misperceptions of preservation" • "There is a perception problem with historic district designation—we need to address it" • "The next generation of preservation leaders is not there; where are the future activists?" • "We're not communicating well about what preservation is, especially to the younger generation" <p>The participants, and HPO, appear to assume or conclude that the problem with preservation is that people don't understand it and all of the wonderful things it does.</p> <p>And preservation has had a valuable impact on DC in a number of ways. Many proposals gain better architectural harmony with surrounding neighborhoods, more interesting ground-level detailing, and more interesting rooflines as a result of the design</p>

		<p>review from the preservation process.</p> <p>But there's a deeper issue than just perception. Preservation is often addressing the wrong problems for today. As Richard Layman often says, the preservation system arose during the era of the shrinking city, when people wanted to tear down beautifully detailed apartment buildings to create parking lots. Then, it was inherently a good thing to place more of the city under historic protection.</p> <p>Today, the city is growing, and the challenge is to shape that growth. It should concentrate in areas with good transit. New buildings need to engage the street as old buildings do, and include some interesting architectural details to avoid a monotony of glass boxes. Designs should avoid leaving large dead spaces at the pedestrian level.</p> <p>In many cases, design review is helpful. And the preservation office is right when it says in the plan that they could do more to communicate the ways projects get better through the process. However, the preservation movement is also full of people who just plain don't want change.</p> <p>With housing prices rising rapidly, the fact that there isn't enough housing is a bigger problem than the fact that some residents have to look at new buildings that might be a little taller than some other buildings nearby. But when preservation is beholden to the anti-height set, it's not solving the problem that many younger (and many older) residents see with development.</p> <p>There's one quotation on the list that gets at the real issue:</p> <ul style="list-style-type: none"> • "Anti-development preservation gives preservation a bad name" <p>Unfortunately, the rest of the document doesn't really follow up on this issue.</p> <p>[continues at Chapter 5 below]</p>
	Amy Ballard, Smithsonian Institution	<p>Congratulations on this beautiful plan! I enjoyed reading it very much. I also enjoyed looking at it – visually it's stunning and very easy to comprehend. Can you please tell me who designed and printed this for you? Did you use a facilitator to help you with the content? [We] want to do something similar but not quite on your scale for our office to bring preservation awareness to SI staff, contractors, the public, etc. I'd be so grateful for any information you can provide.</p> <p>Your plan is a real accomplishment – I certainly have no comments on the draft other than to say it's just great!!</p>
	Louise Dunford Brodnitz, AIA AICP	<p>PRIORITIZE: The emphasis in this preservation plan seems to be in public outreach, and even marketing of the notion of historic preservation with brochures and lots of meetings. The danger is that this plan is trying to do too much with resources spread too thin to be effective and the document is far too lengthy, vague and repetitive for anyone to get much out of. Define the most important three goals for the next three years, the top ten for the next ten years and so on. Be brief and extremely clear on the goal and exactly how it will be achieved within the allotted time.</p>
	Mike Hicks, US DOT	<p>The first comment I want to make pertains to the amount of historical and current information the document contains, that information along with the graphics contained especially within the first two chapters makes it a must have document for anyone, even those with just a remote interest in the history and current preservation efforts ongoing in the Nation's Capital. It's an attention grabber and I hope the Federal Highway Administration, District of Columbia Division receives at least several copies for its office use when the document is finalized.</p>
	Kirby Vining	<p>Long active with the issue of the McMillan Reservoir Historic District, I have become quite familiar with the work of the HPRB and the HPO, and stand very impressed by both the HPRB/HPO's work, and the 2016 Plan which identifies goals and problems which must be addressed in keeping with the purpose of the HPRB.</p> <p>With such a very small staff, I am very impressed with both the HPRB/HPO's work and with the 2016 Plan. I know from personal</p>

		experience both sides of what the HPRB confronts.
		CHAPTER 1: INTRODUCTION
		A Path Forward to 2016
Major Themes of the Plan	Capitol Hill Restoration Society	Of the five themes woven throughout the Plan, getting back to basics, finishing deferred maintenance, and sending more forceful and convincing messages are key to addressing many of the challenges identified in the Plan that struck a chord with us.
Major Themes of the Plan	Citizens Planning Coalition	Reorder themes in terms of importance. Probably #4 [We need to send a more forceful and convincing message] should be listed first, #5 [We need to be open to new possibilities] listed second, and #1 [We need to get back to basics] listed third, #2 [We need to finish some deferred maintenance] should be fourth, and #3 [We need to strengthen and reinvigorate our partnerships] should be fifth.
		Seeking Public Views
	Citizens Planning Coalition	There isn't a more systematic evaluation and analysis of "public views" more generally, which contributes to how preservation is often seen as an obstacle to, rather than as the foundation of the city's current success.
		The District of Columbia's Vision for Historic Preservation
	Citizens Planning Coalition	<p>The elements on pages 8-9: historic preservation goal; diversity of plans and ideas; Washington in our imagination; and changing views and values; would be much stronger if this section were considered in terms of presenting a variety of frameworks from which we could consider historic preservation matters. These often competing frameworks are the source of preservation's sometimes more contentious elements. By not explicating these conflicts more directly, conflict is continued and stoked, rather than assuaged. (My point about planning is that it is supposed to "design conflict out," rather than "design conflict in." Generally, even though all planning ends up being contentious, contention is the product in part of failures in public process.)</p> <p>Frameworks include: (1) Local vs. Federal; (2) "city-wide" versus neighborhoods; (3) the city in the regional context; (4) preservation of "great architecture and sites and places associated with great people and events" versus the preservation of the vernacular, which is the basis of neighborhood preservation; (5) what I consider the three elements of historic preservation that when combined are "the nexus": historic architecture; urban design; and historicity, identity and authenticity.</p> <p>Another important framework to consider would be the spatial patterns of development as determined by transportation infrastructure, which Peter O. Muller termed as distinct eras: the Walking City (1800-1890); the Transit City (1890-1920); the Recreational Auto Era (1920-1950); and the Metropolitan City (1950-present) . (This is also captured in the "America on the Move" transportation exhibit at the National Museum of American History.)</p> <p>Similarly, a framework proposed by Howard Gillette Jr. in <i>Between Justice and Beauty</i>, is particularly relevant to how historic preservation is handled and positioned within the city. The book discusses the tension between a local, social justice agenda focusing local governmental resources on integration and expanding access to jobs and contracts versus a focus on enhancing "the federal city" and the architectural, urban design, and placemaking elements of the city.</p> <p>Historic architecture and historic preservation as key elements of the city's image and "brand" should be discussed in greater detail.</p>

		The city's historic preservation plan should include a cultural interpretation element. With regard to cultural interpretation discussion of the concept of the cultural landscape and the administrative construct of heritage areas should at least be discussed. (Heritage roads and rivers in their transportation context, plus designated scenic byways also.)
		A Revitalization Strategy
	Citizens Planning Coalition	<p>This probably is one of the most important elements of DC's preservation story and for the most part is under-recognized by most stakeholders in the civic process including elected officials and neighborhood activists, with the exception of those people most closely involved in historic preservation matters. This section deserves far more coverage than a couple paragraphs.</p> <ul style="list-style-type: none"> • The Main Street commercial district revitalization program as an element of preservation practice could be discussed at greater length, distinguishing the approach from traditional neighborhood preservation and as a way to attract new audiences and members to the preservation movement. • Relatedly, a section on the economic value of historic preservation should be added to this chapter.
		Advocacy and Leadership
	Citizens Planning Coalition	<p>Failures to acknowledge that preservation is an aging movement and has not been too successful at engaging younger and newer residents. I have also argued that the city's preservation and planning advocacy community "came of age" when the city was shrinking and the primary goal was stabilization and staunching the leakage. Now that the city can and is growing, this community doesn't know how to respond.</p> <p>This section could also acknowledge how preservation is seen as a tactic used by anti-growth elements, with designation applications as a delaying or stopping tactic, because the historic preservation laws and regulations provide the only means for residents to weigh in on zoning matters normally considered "matter of right."</p>
		Challenges and Opportunities
	Citizens Planning Coalition	<p>[This section] should acknowledge the increasing expression of "property rights" opposition to historic preservation designation. Even in a city as politically progressive as is Washington, DC, there is no question that this sentiment is more frequently expressed and is rising.</p> <p>In my opinion, the statement in the last sentence is completely false, or at least, that is not how the preservation movement and process is thought of in most quarters—"Collaboration and consensus about preservation are largely replacing the antagonistic battles of the past." While this issue should be discussed, why this is not the case is really the key challenge-opportunity that is faced by those who espouse the historic preservation agenda with the city.</p> <p>One of the biggest challenges is that much of the city's residential building stock is eligible for designation but not designated, but still worthy of protection.</p> <p>Another challenge is other gaps in laws and regulation that fail to provide much in the way of protection for what could be worthy buildings and places.</p>
		CHAPTER 2: DC HISTORY AND HERITAGE
	Dupont Circle Conservancy	The Conservancy believes that HPO should offer to secondary level teachers in DC public, charter, and private schools Chapter 2, "A Legacy of Visionary Plans," of this 4-year plan as an element for potential inclusion in school social studies lesson plans. This might be a joint effort with Cultural Tourism DC, with it using stories from one or more of its heritage trails. At a minimum,

		DC public and private schools should be made aware of this 4-year plan when it is available in final form as a possible supplement to existing social studies resources.
	Citizens Planning Coalition	<p>Timeline. The addition of the timeline on visionary plans is a definite improvement. However, the information presented, limited to “visionary” plan milestones, is unnecessarily constrained and therefore significantly less informative than it could be. The timeline should be expanded to focus on milestones in the city’s land use and transportation planning more generally, because these activities have significantly shaped the environment that supports and/or constrains city historic preservation policy and practice.</p> <p>A separate overview of architectural history and styles common to the city would be useful.</p>
		CHAPTER 3: PRESERVATION ACHIEVEMENTS
	Citizens Planning Coalition	<p>This section, the way it is organized, designed, and presented, is very very impressive. Nice job. However:</p> <ul style="list-style-type: none"> • Items 1 and 2, “Pride in our heritage” and “Historic landmarks and districts” should be followed by a new and additional item, “Preservation and maintenance of DC as an attractive place to live and visit.” <p>At the roundtable in the Summer of 2011, when this general topic was discussed, I said that “Preservation in fact, ‘won,’ in the sense that quality architecture, urban design, and authenticity was maintained—primarily because of the efforts of preservationists and preservation advocacy groups—despite the many decades when housing and development trends favored the suburbs over the city.</p> <p>So while there is much to lament with regard to the state of historic preservation in the city today, there is much to celebrate. And by doing so, with regard to the preservation of neighborhoods so that they were still present once trends changed and urban living again became preferred, at least by important and growing segments of the population, we can better make the case on preservation’s relevance and importance to new audiences.</p> <ul style="list-style-type: none"> • By adding this third item, the section would then have nine items. • Item 4, “Strong preservation laws,” should be listed ahead of “Responsible civic stewardship.” Too often, the reason government does the right thing is because of the legal requirements of federal and local laws, not out of a sense of stewardship. • Responsible civic stewardship with regard to the DC Government is overstated, although I suppose as a DC government entity you are obligated to include such language. Until recently, my joke has been that the dominant DC government property management strategy was “demolition by neglect.” Plenty of executive agency actions and actions by Mayors have come at the expense of historic preservation and properties worthy of designation. • Plus in this section as well, technically, Congress is not covered by the National Historic Preservation Act. Does this impact negatively, not just positively, the preservation agenda with regard to buildings and sites under the oversight of the Architect of the Capitol? • [various editorial comments] • “Supportive developers and property owners” (p. 40). This section would be significantly enhanced with discussion of tax credit programs and statistics with regard to their use in DC. It should also be noted that as a “strong real estate market,” extra costs that may be associated with historic preservation are normally recouped in higher property values, property attractiveness, tenant attraction, on what we might call “creative class” type grounds. • In fact, this fact, that DC is a strong real estate market, could be listed as an additional reason “Why Preservation Works in DC.” The same goes for how “historic architecture is a defining element of the city’s identity, authenticity,

		image, and brand.”
	Kirby Vining	I must add, in closing, that the HPO staff has proven more professional, more passionate than the staff of any other office of the DC government with whom I have worked. When I call or write, I get a response, a helpful response, promptly, every time. I wish this were more common throughout our government. The detailed descriptions and historical analysis I have seen done by the HPO are impressive and clearly go beyond what a mere job description could require of the HPO staff. The HPO staff work is clearly done with a passion to find what is of value and merit, and what is not.
		CHAPTER 4: PRESERVATION CHALLENGES
	Citizens Planning Coalition	<p>This section of the plan would have been significantly enhanced by a parallel and more formal review and gap analysis of the preservation agenda and program and operations in the city (comparable perhaps to the “self study” process that colleges and universities are required to conduct as part of the re-accreditation process) . It is important, especially in a master plan, for this section to be thorough, because it sets the stage for the potential for improvements. It would also have been useful for a review of comparable operations in other cities.</p> <p>The point I make about planning and zoning is that the outcomes from our processes are supposed to “improve quality of life.” When this in fact does not occur indicates that there are problems with our processes and is an obvious way to figure out what the problems are and how to resolve them with issues such as lack of design review, tear downs, and pop ups.</p> <p>For example, DC’s historic review process in neighborhoods is “less formal” than in other cities, where specific design review committees are created for each neighborhood. By comparison, in DC neighborhood preservation groups weigh in as do most ANCs. Probably a different procedure is in order, more comparable to how it is done elsewhere.</p> <p>Another way to look at controversies and complaints is as “indicators” of potential problems. In any case, each of the presented items on p. 44 [What We Heard from our Constituents] are deserving of deeper discussion than is otherwise presented.</p>
		Limited Financial and Human Resources
	Citizens Planning Coalition	It should have been discussed that there are almost no paid staff for citywide and neighborhood preservation organizations. There is a significant capacity issue with regard to local historic preservation (and planning knowledge) as a result.
	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> • Deeper capacity building institutions are required to improve the review process (witnessing various hearings, it is clear that most neighborhood stakeholder organizations and ANCs don’t really understand what is at stake, especially in relation to the NHPA and the local landmarks law). • More resources are necessary to make the preservation process more transparent (e.g. the comments as submitted by ANC2B). • The agency [HPO] is under-resourced in terms of enforcement. • The citywide and neighborhood preservation groups have limited resources. • Programmatic support for preservation related groups [is needed]. • Provide neighborhoods with means to collect, codify, interpret, and present history (DCHPO, DC Humanities Council, CTDC, DC Public Library).

	Dupont Circle Conservancy	HPO states that it does not expect additional personnel resources during the coming 4 years. The Conservancy understands HPO's position on staffing issues. However, to accomplish the goals of this proposed plan, HPO must, at a minimum, maintain its current staffing level and have access to financial resources to fill any personnel vacancies created by the departure of any existing staff during the plan's span. As the DCC has noted in the past, we are concerned that the current number of inspectors is not sufficient to monitor approved plans and rogue activities in this historic district and the others in the city with its current active residential and commercial development.
	Dupont Circle Conservancy	DCC urges HPO to make all possible use of interns from appropriate university study programs related to historic preservation. Student assistance helps spread the word and the value of historic preservation to new audiences.
	Dupont Circle Conservancy	Early in the draft a statement was made that historic preservation is more than signing off on permits. We agree, but we believe that the draft plan gives staff short shrift by not mentioning something about this daily activity, its impact on staff time, and its financial benefit to the DC government. It doesn't have to be a long narrative, but leaving it out gives an incomplete picture of HPO's tasking; and In this same framework, include HPO's time and effort in support of the Historic Preservation Review Board.
		Inadequate Communications
	Citizens Planning Coalition	A formal review of all the various publications produced by HPO and the neighborhood organizations (brochures, newsletters, guides, etc.) should have been conducted, including a review of tours, lack of a common organizational calendar, etc. Relatedly, there is a significant "system failure" in terms of not leveraging the potential power of the "network effect" of all the various preservation groups in the city in terms of providing neighborhood-specific and city-wide training and resources.
Online Information	David Alpert, Greater Greater Washington	<p>[continued from Poor Understanding of Preservation Below]</p> <p>We need pictures!</p> <p>The Historic Preservation Office (HPO) is right that people aren't aware of all of the positive effects of their review on development. One big step they could take to improve transparency (or, after using a thesaurus to find a word starting with 'p,' pellucidity) is to put images of the proposed buildings online.</p> <p>Right now, you can access staff reports online, which go into ornate detail about the building. Take this paragraph about the project at 13th and U:</p> <p style="padding-left: 40px;">The composition has been organized with three vertically-oriented towers so that it doesn't look squat or horizontal; the corner balconies and paired windows help reinforce the vertical emphasis. The rhythm and proportions of fenestration on the residential floors is consistent with historic apartment buildings, while the first floor is designed and articulated to reinforce the street's pedestrian scale and retail character.</p> <p>That's great, but can you really picture the building based on that description? As they say, a picture is worth a thousand words, and in the case of architecture, maybe many thousands. It's really almost impossible to understand what they're talking about without a picture:</p> <p>I was able to post that picture because this developer put renderings online when they presented them to ANC 1B, but many don't. The preservation office isn't making their decisions based on prose, but on sketches.</p> <p>Historic Preservation Review Board (HPRB) members get many pages of drawings before their meetings. These are almost always, if not always, just print-outs from the architect's computers. It shouldn't be hard to have the architect submit electronic</p>

		<p>files and put them online.</p> <p>The DC Office of Zoning recently deployed a nice system that lets you search for a zoning case and see all of the submissions, both textual and graphical, as PDFs. Why not the same for historic preservation, or even work with OZ and use the same system?</p> <p>Often, I hear about buildings where the board seemed to make the right decision, or where a project improved based on staff review. It would be great to run posts about those. With pictures, it would become far more feasible.</p> <p>This should be a top priority for the office. I didn't see it in the plan.</p> <p>We need information earlier!</p> <p>When a project appears on the HPRB agenda, it's actually fairly late in the design review process. The property owner has usually shown the design to the staff and gotten considerable feedback already.</p> <p>Often the staff makes designs better through this consultation. (Sometimes they make it worse.) If they want people to see the positive effects of preservation review, the next step should be to peel back the curtain on this somewhat.</p> <p>It starts with a property owner submitting a permit application. Post those online, and then post the designs at each step along the way. Residents could see a slideshow of how a project has evolved, hopefully for the better, through the process from start to finish.</p> <p>Maybe property owners don't want people to know about their plans until they are farther along, though it's not clear the government should be in the business of catering to that desire for secrecy. If there is a reason to maintain some silence, then perhaps the office can post all of the original and intermediate renderings once a project reaches the point of becoming public, such as going on the HPRB agenda or having a zoning hearing.</p> <p>[continues at Design Guidelines C2 below]</p>
Public Outreach	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> • GWU and the creation of a local history museum has involved little outreach by GWU to the broader history community. Who represents city and resident interests in such matters?
		Poor Understanding of Preservation
	David Alpert, Greater Greater Washington	<p>The latest historic preservation plan essentially concludes that people don't trust historic preservation in DC because they don't know enough about it, and recommends that staff and advocates push harder to persuade people of preservation's positive effects.</p> <p>As I argued yesterday, that's not preservation's primary problem. Rather, it awkwardly absorbed many resident desires to shape development, from laudatory ones like wanting buildings to engage the street and eschew vinyl pop-ups to the too-common impulse to simply block any buildings that are even slightly tall.</p> <p>Preservation needs to confront these questions of what it should and shouldn't restrict and what kinds of outcomes it's looking for. Meanwhile, it can take some immediate steps to define much clearer rules, make preservation decisions more predictable, and let people to see how projects have evolved through the process.</p> <p>[continues at Inadequate Communications above]</p>
		Negative Attitudes about Preservation

	Citizens Planning Coalition	<p>[continued from General Comments above]</p> <p>Preservation as a hindrance has been stoked by negative coverage in the local media, a rise in property rights sentiments, and the way that preservation regulations can be “used” or manipulated as a stratagem to oppose and/or delay development projects (such as with the Wisconsin Avenue Giant Supermarket redevelopment). At the same time, it’s fair to say that preservation organizations and activists came to the fore during the time of the “shrinking city” and they haven’t yet “repositioned and recalibrated” their approaches and agenda for a city and neighborhoods that have the opportunity to grow.</p> <p>[continues at Threatened Resources below]</p>
		Opposition to Historic Districts
	ANC 2B	<p>10. Respect for Democratic Choices: The plan should address how to improve upon the substantive rules for historic districts and the processes for approving historic districts, not just how to communicate about preservation more effectively. The plan frames the opposition to new historic districts in Barney Circle, Chevy Chase, and Lanier Heights as a communication and perception failure. This implies that if residents had better understood historic district designations, the districts would have been approved. This demonstrates a lack of respect for the democratic process. It also represents failure to recognize that the substantive rules of historic districts may need to be revised to address legitimate voter concerns.</p>
	Citizens Planning Coalition	<p>Each failure to create a historic district is a tremendous opportunity for evaluation and self-criticism, and knowledge and experience capture. For the most part that isn’t be[ing] done. So failures continue. Property rights issues should also be discussed in this section.</p>
	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> • Property owners who oppose preservation because it limits their ability to monetize their properties for more intense development (the current Chinatown issue)
		Threatened Resources
	Citizens Planning Coalition	<p>[continued from Negative Attitudes about Preservation above]</p> <p>Conflicts and Developments in Preservation Theory and Practice</p> <p><i>Preservation as a law vs. preservation as a movement.</i> One of the unintended negative consequences of the passage of a local preservation law and the creation of a mechanism and system for carrying out the law is that historic preservation ends up becoming a legal construct—a law, regulations, and a regulatory process—and less a movement. Property owners, especially developers, see historicity as a matter of law, rather than an inherent characteristic of a property.</p> <p>If a building or neighborhood is legally designated historic, then it is historic and is to be protected. If the building or neighborhood is eligible for designation as historic, but isn’t designated, is the building or neighborhood worthy of stewardship, or just a bunch of buildings able to be altered beyond recognition?</p> <p>To most developers, lack of historic designation means that the building has no historic significance, even if it does, but hasn’t been designated. Although there are many developers who seek out historic preservation tax credits when appropriate, or pursue projects that can only be realized through the provision of preservation and other tax credits and other incentive programs.</p> <p>Preservation policy within the city for the most part ends up being defined within the context of the law, which was written in the 1970s (with some modifications). Unfortunately, as preservation theory and practice has advanced, the law and</p>

regulations mostly remain static.

Preservation ends up focusing on the construction, alteration, and maintenance of buildings and districts that are already designated, and no one agency has responsibility for historical and cultural interpretation, and protection of buildings and places that may be worthy of historic designation but are not otherwise protected is not addressed in a systematic way (the new Ward Heritage Planning Process will be an important response to this gap).

Preservation of special places and buildings associated with important events versus vernacular preservation (especially of neighborhood historic districts). There are many ways to consider the significance of buildings, sites, and places, on at least five dimensions: (1) architectural and use; (2) neighborhood-cultural-social; (3) countywide; (4) regional and/or state; and (5) nationally. The building can be significant and worthy of designation on one or more of these dimensions and it isn't necessary to meet the criteria of significance for each in order to be designated.

Many people still believe that the point of historic preservation is the preservation of particularly worthy buildings and sites associated with key people, architecture, and events--like Mount Vernon, President George Washington's plantation, or Independence Hall in Philadelphia, where the Continental Congress met and the Declaration of Independence was signed, etc.

People have a harder time grappling with preservation of the vernacular, in particular "ordinary houses" in "ordinary neighborhoods", which when designated are contributing structures in historic districts.

But since the 1920s, with the development of the movement to create a "neighborhood" historic district in Charleston, South Carolina, preservation has also been about preservation of the vernacular and community, not just great buildings (earlier preservation efforts focused on the preservation of Mount Vernon and then Monticello).

I call this kind of historic preservation preserving the nexus of architecture (mostly buildings), place (including urban design), and history (people). Another way to think about this is in terms of the concept of the cultural landscape.

This is the type of preservation most often associated with the creation of neighborhood historic districts or the designation of key buildings that are significant within neighborhoods particularly, even if there are other similar types of buildings present elsewhere in the locality.

Two concepts are key: (1) the period of significance--the time period for which the history of the neighborhood, including the predominant architectural styles, is significant in terms of preserving and recognizing the neighborhood; and (2) the context of the built environment.

Better definition of "historic." I would argue that what people think of as "historic preservation," is constructed of three different elements:

- (1) historic architecture, in particular, certain architectural styles, characteristics, and practices (in DC, the federal city is marked by classic styles, while the most distinctive residence is typically a rowhouse, especially those constructed before 1910);
- (2) urban design, that is the spatial pattern of the L'Enfant city; the organization of blocks, practices fostering attached housing, streets and infrastructure, including road materials (e.g., alleys constructed of specific types of bricks; asphalt block, etc.) and street furniture, the "Park-ing" regulations concerning front yards, etc.
- (3) history, identity, and authenticity, including people and social, community, and cultural elements.

Without a clearer explication and definition of each of these elements, conflict and lack of consensus amongst residents and stakeholders is likely to persist.

[Continues at Design Guidelines below]

	Citizens Planning Coalition	Threatened resources Is an indicator of lack of survey and failures to have adequate remedies in place, including design review and demolition protections for properties and neighborhoods eligible for but not designated.
	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> Corcoran debacle as an illustration of why broader scenario planning with regard to landmarks may be advisable (HSW as another example)
Archival Documentation	Louise Dunford Brodnitz, AIA AICP	Far too little attention is paid in this plan to the dangers of lost documentation. Research of individual properties is hampered by the randomness and fragility of documentation, particularly of the older neighborhoods. Valuable documents on Georgetown, for example, shown in the National Archives database, are completely missing and probably stolen. Other documents from when Georgetown was part of Maryland are only found in Annapolis, and it's not clear whether those remain intact. Archives of the built environment should be a key challenge but it is not even mentioned.
		Insensitive Development
	Citizens Planning Coalition	<p>[continued from Design Guidelines below]</p> <p><i>Preservation regulations versus zoning regulations.</i> A significant problem in practice is that R1 to R4 regulations concerning height and mass allow for residential buildings significantly larger than architecture and construction practices prevalent during the periods when most of the city's residential building stock was constructed (pre-1950, especially pre-1930).</p> <p>Most neighborhoods were constructed of buildings no more than two stories high, typically less than 25 feet high, although some of the more central neighborhoods (Dupont Circle, Georgetown, Columbia Heights, Capitol Hill) have large areas of three-story single family housing (four story single family housing, except on occasion in mansions, is extremely rare).</p> <p>[continues at Need for New Tools below]</p> <p><i>Cultural landscape as an organizing framework for preservation practice in DC.</i> One way to respond to advances in preservation theory and gaps in local preservation policy would be to adopt the concept of the cultural landscape as a new framework to organize preservation practice. Scenic roads and byways and heritage areas are the most common way of executing the concept in practice.</p> <p>There are two types of heritage areas. States such as Pennsylvania and Maryland have an extensive state heritage area program. Congress also designates National Heritage Areas, which are overseen by the National Park Service. As an example, Baltimore started out as a state heritage area and later received designation as a National Heritage Area. Heritage areas create a management plan as part of the process for designation.</p> <p>While DC does not necessarily need to pursue formal designation as a heritage area, and heritage areas are more typically focused on cultural interpretation, nothing prevents the city from adopting the approach as a way to manage and extend preservation practice.</p> <p>Such an approach could involve enacting basic protections concerning alteration and demolition for all buildings eligible for designation, and design review based on urban design principles, for new construction on key corridors, whether or not buildings are located within historic districts or designated as individual landmarks.</p> <p>This approach would have provided a way to address criticisms of the exterior design of a new apartment building which will be constructed by Cafritz interests in Chevy Chase, a neighborhood eligible but undesignated. The building, on Connecticut Avenue, one of the city's major avenues and home to distinctive apartment buildings, is to be constructed with a glass curtain wall typical of office construction. A design review process could have addressed the concerns that are otherwise</p>

		unaddressable under DC regulations, had a cultural landscape framework been in place to guide decision making and approvals.
	Citizens Planning Coalition	<p>The need for design review is paramount on major arterials (the avenues in particular) and in commercial districts whether or not these places are designated is necessary. Plus a sign design review ordinance for commercial properties. And better regulations with regard to popups and teardowns. Right now there aren't any.</p> <p>Speaking of gaps with regard to popups. The popup problem derives from the fact that zoning maximums for heights of residential buildings typically are significantly larger than was typical practice back when the city's neighborhoods were constructed, especially for those neighborhoods constructed before 1940. The easiest solution would be to change "matter of right" height to the typical heights of the periods when neighborhoods were constructed, and to allow taller buildings and additions only through a variance/special exception process. This is not mentioned anywhere in the Plan Draft.</p>
	Historic Anacostia Design Review Committee	And last but not least Zoning Regulations and the lack of quality development. Zoning regulations have nearly decapitated our community. Residents of Historic Anacostia are alarmed at the negative effects we've already seen due to the lack of zoning regulations that encourage quality development. For example, the new Salvation Army Building, which is seen by many residents out of context and incompatible with the historic commercial corridor, was permitted under the zoning code as a matter-of-right development. The building's size is not only woefully out of scale with the surrounding neighborhood, but the use of cheap/inappropriate materials coupled with an awkward design have resulted in the neighborhood calling the building one of the "ugliest" building in Washington, DC. There are several ways in which Historic Preservation Office (OP) can help us avoid another catastrophe and support initiatives that are important to the residents of Ward 8:
		Need for New Tools
Conservation Districts	ANC 6B	<p>In preparing the draft plan, HPO staff sought the feedback of a number of constituents and community groups. One comment – the need for new tools beyond historic designation – particularly resonated with our commission.</p> <p>Not all neighborhoods in the city can or should be designated as historic districts. During the debate over the proposed Barney Circle Historic District, a number of ANC 6B commissioners and residents expressed interest in exploring the concept of "conservation" or "preservation" districts. Such districts, not currently defined in DC law, would aim to protect certain historic features of buildings while not subjecting an entire neighborhood to the standardized guidelines common to most historic districts.</p> <p>Though the goals in the draft plan specifically reference the need to "develop guidelines that address the issues and sensitivities of specific neighborhoods or historic districts" (Goal C2, page 52) and "investigate tools to discourage overscaled and incompatible development that disfigure the character of neighborhoods (C3, page 53)," there is no specific action related to concepts such as "conservation" or "preservation" districts. Such a tool could be a solution in the Barney Circle neighborhood. ANC 6B urges HPO staff to specifically add "examine the viability of conservation or preservation districts in DC" as an action in the plan.</p> <p>ANC 6B agrees with HPO's objective to "develop more useful and more comprehensive public information materials and illustrated guidelines for the historic preservation review process (Goal C2, page 52)." At times, historic preservation review can seem quite subjective. Our commission and constituents would benefit from more detailed guidelines which we could cite in cases reviewed by our commission.</p> <p>ANC 6B also strongly supports efforts to improve the HPO website which, in its current form, is quite cumbersome and difficult to navigate. We certainly understand that HPO has limited flexibility in website design, but small improvements that make it</p>

		easier for residents to find guidelines and information on HPRB actions would be helpful.
Conservation Districts	Citizens Planning Coalition	NEEDS TO BE MUCH MORE SPECIFIC INSTEAD OF HYPER-VAGUE AND HYPER-GENERAL. Changes to zoning heights, addition of design review, demolition protections for eligible properties, the concept of conservation districts (although this is mostly just design review and demolition protection anyway, although generally design review in conservation districts is extremely limited) receivership options to address demolition by neglect, etc
Conservation Districts	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> • How the preservation law is one of the only tools in DC law that provides opportunities for residents to have input into land use regulation processes as a matter of course (especially when compared to typical “matter of right” practices) • Limited remedies to address demolition (other than historic designation) • How to help neighborhoods seeking to protect/acquire significant buildings (e.g., the Takoma Theatre) • Historic districts vs. conservation districts vs. more general design review requirements (justified by urban design and/or cultural landscape considerations)
Conservation Districts	Kent Boese, ANC SMD 1A08	<p>First and foremost, I find it interesting that there are no historic districts in ANC 1A when we have such a large geographic area. I can only attribute this to being too far north and to the east of 16th Street. As we've discussed, historic preservation is a new frontier in ANC 1A with me tending to lead the charge.</p> <p>So, here is what I would propose. Use my neighborhood -- Park View -- for a pilot project to see if there is any merit to pursue Conservation Districts. By approaching it as a pilot project, with regularly scheduled community meetings to address issues and fine-tune the challenges and benefits of what could be included in a Conservation District, we could work together to develop a good balance. At the end of the pilot, the community could vote to remain in a Conservation District, or elevate the district to a full fledged Historic District. I am willing to introduce an ANC Resolution to this effect if you believe it will be taken seriously.</p> <p>Why might I suggest using Park View as a test case? That is easy. I have already accomplished some of the goals you've outlined in the draft. Some of those are:</p> <ol style="list-style-type: none"> 1) Written and published the Park View book for Arcadia (2011): http://www.amazon.com/Images-America-Arcadia-Publishing-ebook/dp/B0099YCN4Y/ref=dp_kinw_strp_1 2) I've already mapped out the developmental history of Park View: http://parkviewdc.com/2011/09/02/have-you-ever-wondered-who-built-your-house/ 3) I have already started a comprehensive inventory of historic properties within ANC 1A http://www.anc1a.org/Historic%20Preservation%20Committee/Report%20on%20Historic%20Landmarks%202013.pdf (and have gotten some great ideas on how to enhance that inventory from your report). 4) I have created a historic Park View walking tour to help make the concept more popular and fun for the community.
Heritage Areas	Citizens Planning Coalition	<p>[continued from Insensitive Design above]</p> <p><i>Cultural landscape as an organizing framework for preservation practice in DC.</i> One way to respond to advances in preservation theory and gaps in local preservation policy would be to adopt the concept of the cultural landscape as a new framework to organize preservation practice. Scenic roads and byways and heritage areas are the most common way of executing the concept in practice.</p> <p>There are two types of heritage areas. States such as Pennsylvania and Maryland have an extensive state heritage area program. Congress also designates National Heritage Areas, which are overseen by the National Park Service. As an example, Baltimore started out as a state heritage area and later received designation as a National Heritage Area. Heritage areas create</p>

		<p>a management plan as part of the process for designation.</p> <p>While DC does not necessarily need to pursue formal designation as a heritage area, and heritage areas are more typically focused on cultural interpretation, nothing prevents the city from adopting the approach as a way to manage and extend preservation practice.</p> <p>Such an approach could involve enacting basic protections concerning alteration and demolition for all buildings eligible for designation, and design review based on urban design principles, for new construction on key corridors, whether or not buildings are located within historic districts or designated as individual landmarks.</p> <p>This approach would have provided a way to address criticisms of the exterior design of a new apartment building which will be constructed by Cafritz interests in Chevy Chase, a neighborhood eligible but undesignated. The building, on Connecticut Avenue, one of the city's major avenues and home to distinctive apartment buildings, is to be constructed with a glass curtain wall typical of office construction. A design review process could have addressed the concerns that are otherwise unaddressable under DC regulations, had a cultural landscape framework been in place to guide decision making and approvals.</p>
Overlay Districts	Historic Anacostia Design Review Committee	<p>Creation of an arts overlay for the Historic Anacostia commercial corridor that would encourage the clustering of uses into unique destination districts along Martin Luther King Jr. Ave. - leading all the way up to St. Elizabeth's. For e.g., an arts and entertainment area in Historic Anacostia, support for neighborhood serving retail areas along the MLK corridor, support for retail/commercial activity near Barry Farms, and increased density for buildings near the Anacostia metro station. We've been working with the OP since 2010 on our proposal and want to ensure that the development of the Anacostia zoning overlay remains a top priority for the agency.</p>
Financial Incentives	Kent Boese, ANC SMD 1A08	<p>[Here is an enhancement] that I think the District needs to adopt:</p> <p>One of the biggest perceived negatives to preservation is cost. While I recognize that historic districts hold their value and are very desirable ... many residents have concerns about the impact to their personal budget. I think that residents in historic districts (or conservation districts) should be assessed an additional tax on top of their personal property tax that creates a fund to be used for maintenance and upkeep for properties in that district. Even if the tax is only up to 1% on the \$100,000 of value, it will eventually add up. Think of it as an insurance fund that will not cost the city any money. The money comes from the residents and is to be used by the residents it comes from. Because of homestead deductions and reduced rates for seniors, those living in the neighborhood -- and aging in place -- will not be unduly taxed. As the neighborhood improves and property values go up, so does the fund. Also, because a lot of taxes are paid via the mortgage company, most households will not feel the pain in their pockets.</p>
		<p>Preservation Program Enhancements</p>
Great Weight	ANC 2B	<p>2. Great Weight: Addressing ANC opinions. The plan should address improving how ANC resolutions are discussed in HPO staff reports and HPRB decisions. The HPO/HPRB needs to comply with D.C. law requiring agencies to provide "great weight" to ANC opinions by addressing, point-by-point, any ANC resolutions submitted to the HPO/HPRB. Currently, HPO staff reports frequently fail to even mention the ANC opinion, let alone discuss each substantive point set forth in the ANC resolution as required. This means that the final HPRB action, which is generally an adoption of the staff report (with or without changes), does not explicitly address relevant ANC resolutions. This violates D.C. law and needs to be corrected.</p>
	ANC 2B	<p>3. Great Weight: Notice to ANCs. The plan should address improving notice to ANCs of applications before the HPRB. The HPO/HPRB is the only regulatory board that does not currently send a notice document directly to ANCs for each application</p>

		within the respective ANC that will be on the board’s agenda. This is contrary to the practice of the Alcoholic Beverage Control Board, the District Department of Transportation Public Space Committee, the Board of Zoning Adjustment, and the Zoning Commission. In practice, this diminishes “great weight,” because it prevents ANCs from carefully reviewing HPO/HPRB applications and providing timely and thoughtful opinions.
Great Weight	Citizens Planning Coalition	ANCs tend to not understand what “great weight” means in the context of the local preservation law.
Great Weight	Kent Boese, ANC SMD 1A08	[Here is an enhancement] that I think the District needs to adopt: Actually give great weight to the ANCs. When we develop an inventory of properties we think have historical interest or merit, this information should be incorporated by DCRA to trigger a larger review of the property prior to issuing permits. This does not happen. If an ANC has taken the time to create an inventory of historic properties, that information needs to be captured and trigger a review by HPO before any permits are issued. We should not be forced to re-actively file landmark nominations and battle property owners unnecessarily. This created tension, unnecessary fights, and bad press.
Understandable Decision-Making	ANC 2B	4. Transparency and Accessibility: We support the plan’s recognition that the “government’s rules for the preservation process should be understandable and easily obtained.” We find that HPRB/HPO decision-making is difficult to predict and difficult to follow. The HPRB/HPO should develop and share an understandable plan of procedures and guidelines. This should include (1) an HPRB docketing system, (2) published transcripts of all HPRB meetings, (3) final crafted and published HPRB orders, similar to the orders issued by other boards such as the Board of Zoning Adjustment or the Alcoholic Beverage Control Board. Again, those orders should address ANC resolutions point by point, as described above.
Understandable Decision-Making	Capitol Hill Restoration Society	[<i>Major needs</i> include] for HPO and HPRB, establishing clearer bases for making determinations about compatible and incompatible changes to historic properties [page 44], and explaining them to property owners so decisions don’t appear arbitrary and capricious. This could involve new ways of articulating, organizing, and presenting the kind of information often included in staff reports, as well as capturing and synthesizing HPRB comments and reasons for concern, and then making it available and searchable online.
Understandable Decision-Making	Citizens Planning Coalition	With regard to “a need to establish a stronger basis for making and explaining determinations about compatible changes to historic properties” THE FIRST THING THAT NEEDS TO BE MADE CLEAR which usually isn’t is that these decisions are made with regard to the context statement for a district or property and the eras of architectural significance and the elements of architectural styles during those periods. If decisions are made in this context, then there is a significantly strong basis and foundation for the decisions. However, too often people believe that the issues are those of “aesthetics” and made on a relative rather than absolute basis and so the decisions are frequently challenged. Similarly, one of the big problems is the issue of new construction and context sensitively vis-à-vis the Secretary of Interior Standards. On the other hand, some leading preservation theorists and practitioners recommend that rather than discordant infill construction, sensitive congruent architecture be constructed instead. This “controversy” should be discussed. This is the issue with the Cafritz project on Upper Connecticut Avenue. While the building is not in a designated historic district, Connecticut Avenue is an important boulevard in the Urban Design Element of the Comprehensive Plan, and while the Element, shockingly, does not discuss architectural quality and identity in the context of these streets, design review for new construction would make sense, certainly vis-à-vis the glass building that will be constructed by the Cafritz Companies, where by comparison virtually all of the other apartment buildings on the corridor are constructed of brick, and the glass curtain-wall design is as undistinguished as any building in the K Street commercial district.

Understandable Decision-Making	David Alpert, Greater Greater Washington	<p>[continued from Staff Reports below]</p> <p>A few steps can make a difference</p> <p>Preservation has many beneficial effects on our built environment. However, it's too opaque and decisions often seem capricious. The preservation office can work to repair preservation's reputation by tackling two problem areas:</p> <p>First, make sure that people can see what property owners propose and what changes came out of the preservation process. Post online renderings of projects when they first come to HPO, as they evolve through consultation with staff, when they go to HPRB, and the final outcomes.</p> <p>Second, make sure people can see why those changes came about. Develop detailed and specific guidelines that any property owner could read and understand generally what would and wouldn't go forward. When a case is controversial and goes to the board, make sure staff reports and board decisions then cite these guidelines to ground the decisions in something other than flighty opinion.</p>
Staff Reports	David Alpert, Greater Greater Washington	<p>[continued from Design Guidelines below]</p> <p>Cite the guidelines in reports and decisions</p> <p>Then, when crafting staff reports on projects, cite each recommendation to a guideline. Say that the building needs to have more of a setback? Then refer to a guideline that says this. If there's no guideline to that effect, then it's not incompatible. Write a new guideline that defines the incompatibility, and use it for future cases.</p> <p>Likewise, if HPRB goes against the staff recommendation, it should have to quote guidelines that form the basis for that decision. Don't simply declare that a building ought to look different; point to a written document that other people besides the board would likely interpret as meaning the same thing.</p> <p>This would make decisions seem less arbitrary. Instead of reading like an aesthetic judgment, a staff report would be interpreting the guidelines in a clear way. Others might disagree with the interpretations at times, but it's not just coming from nowhere.</p> <p>The Mayor's Agent can also hold HPRB to a more rigorous standard. When the Board of Zoning Adjustment grants a variance or a special exception, it writes a detailed, legalistic set of factual findings and conclusions of law based on the regulations.</p> <p>HPRB doesn't need to be quite so meticulous, but nor does it get carte blanche to make any judgment unquestioned. In the law, it's actually technically only an advisory body. But it's usually not treated as an advisory body; the staff follows HPRB's rulings as if it's the official arbiter of "compatibility."</p> <p>In the law, the mayor, who acts through an official known as the Mayor's Agent, can override any HPRB decision. The Mayor's Agent could declare that if HPRB votes to deny a permit, they need to point to some guidelines that justify it, or not have its "advice" given much weight.</p> <p>[continues at Understandable Decision-Making above]</p>
Staff Reports	ANC 2B	<p>5. Ensuring Timely and Fair Staff Reports: The plan should address how to improve the timeliness and fairness of HPO staff reports. The HPO needs to release draft staff reports in time for relevant ANCs to weigh in and respond, before the HPRB hearing on the matter. Otherwise, ANCs are submitting opinions in a vacuum, rather than addressing the discrete points that will be before the HPRB in the staff report. In addition, the HPRB needs to ensure that staff reports are fair and cite all relevant precedent. For example, the HPO issued a 16-page staff report on the ICG/Third Church project (900 16th St NW) that referenced the height of buildings as far away as Massachusetts Avenue NW, but never mentioned the Hay-Adams Hotel less than one block away, which was granted a waiver by HPRB four years earlier, and is higher than what the ICG/Third Church</p>

		sought in its application.
Preservation Review Process	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> there isn't a formal process for acting on determinations of eligibility (such as those resulting from Section 106 reviews) a more formal structure for setting up "historic district review processes" (perhaps more comparable to those used in other cities) should be considered
Appeals Process	ANC 2B	6. Fair Appeals Process: The plan should address the process for appealing an HPRB decision, which can be slow and costly. The HPRB/HPO should work together with the Mayor and Council to develop and ensure a fair, efficient, and transparent appeals mechanism that is not overly burdensome on applicants.
Other DC Policies	ANC 2B	7. Recognition of the Place of Preservation Among Other Important Policies & Values: The plan lacks any discussion of how preservation fits into the framework of broader law and policy in the District, and that other values and policies – such as civil rights, treatment of the aged and disabled, public safety, smart growth, individual property rights, or economic development – may at times override preservation concerns.
Other Laws	ANC 2B	8. Consideration of Americans with Disabilities Act (ADA) Concerns: The plan should address how to improve HPO/HPRB procedures when seniors and the disabled are involved. The HPO/HPRB needs to provide for fast-tracked consideration of ADA-related proposals – especially those that involve modifications to structures to allow seniors and those with disabilities to stay in their homes. Seniors and disabled citizens who suffer health setbacks cannot wait months or years for approval of such modifications.
Other Laws	ANC 2B	9. Recognition of the Supremacy of the Constitution and Federal Law: The plan should address how HPO/HPRB will incorporate applicable Constitutional and federal laws explicitly into its decision-making. The HPO/HPRB must recognize that the United States Constitution and federal law, as the supreme law of the land, control HPRB/HPO decision-making and actions. In past cases, the HPRB has refused to consider or discuss the implications of the First Amendment, the Religious Freedom Restoration Act, the Religious Land Use and Institutionalized Persons Act, and the Americans with Disabilities Act (ADA). This was done ostensibly on the basis that the HPRB is limited to considering only the relevant regulatory factors under D.C. law, and those federal questions went beyond that limited scope. This represents a fundamental misunderstanding of how law works in the United States. All government bodies must comply first and foremost with the Constitution, then applicable federal law, and then applicable local law. Ignoring Constitutional and federal law questions is not behaving with limited scope and power, but with overly expansive power. D.C. laws limit the powers of the HPO/HPRB, and the Constitution and federal law limit those powers even further.
Other Laws	Citizens Planning Coalition	<p>[Some recommendations/observations:]</p> <ul style="list-style-type: none"> RLUIPA as an issue, churchly blight as a serious problem (Shiloh Church, deterioration of the Woodson House as demolition by neglect)
Economic Hardship	ANC 2B	11. Expanding the "Economic Hardship" Criteria to Include Non-profits: The plan should address correcting the oversight that non-profits are not explicitly included in the waiver rules. Under existing rules, applicants who demonstrate economic hardship may be granted a waiver. However, the rules as drafted include hardship on for-profit entities, but do not include non-profit entities, such as schools, charities, or religious institutions. This should be corrected.

		CHAPTER 5: GOALS, OBJECTIVES, AND ACTIONS
	David Alpert, Greater Greater Washington	<p>[continued from General Comments above]</p> <p>Individual goals focus more on salesmanship than fixing problems</p> <p>The plan seems to assume, but not directly argue, that giving the preservation office control over more of what happens in the city is the ideal goal.</p> <p>The chapter on "why preservation works in DC," for instance, almost entirely focuses on the numbers of historic districts and numbers of landmarked properties, as well as extolling the support for preservation from the federal government, DC's local laws, advocacy organizations, and developers.</p> <p>In several recent cases, people have opposed historic districts. That's not because they don't understand what preservation means. Rather, residents are often very concerned that preservation staff and the Historic Preservation Review Board will arbitrarily allow or block elements simply based on personal whim, subjective, aesthetic judgment, or an agenda to repel growth. That's not imaginary; that is indeed what often happens.</p> <p>The office needs to find ways to design the preservation process so residents can get the positive effects of historic designation and fewer of the negative ones. This report, however, doesn't explore that. Instead, it focuses on how to convince people to support preservation as is.</p> <p>[continues at D1 below]</p>
	Citizens Planning Coalition	Capacity building for preservation organizations should be an additional element of section B.
Priorities	Committee of 100 on the Federal City	The draft plan's 13 goals are grouped in four clusters, A through D, with many action items identified as priorities. But, it is not clear if the overall clusters themselves are in a prioritized order with "A" being the most important. If not, they should be so that the public knows what HPO's top one or two attention areas are.
Priorities	Dupont Circle Conservancy	The Conservancy has the following observations and recommendations for HPO consideration: The plan's 13 goals are grouped in four clusters, A through D, with many action items, some identified as priorities. Are the overall clusters themselves in priority order with "A" being the most important? If so, HPO may wish to add an introduction sentence indicating that their order may change during the coming 4 years, depending on changing circumstances. If the four groups are not in priority order, should they be so that the public knows HPO's top one or two attention areas?
A1	Capitol Hill Restoration Society	Time and again we see alley structures neglected, dismissed as unimportant, and/or considered ripe for demolition. Conducting and completing alley surveys would be an important first step toward recognizing the significance of these structures. Equally important would be issuing guidelines about alley structures that would articulate their historic significance and provide guidance about appropriate evaluation and treatment. We suggest designating this action as a priority.
A1, A3	Kirby Vining	With that in mind, I am very supportive of two of the many initiatives included in the 2016 Plan, specifically the city survey and map and public outreach initiatives, which are related in my mind. Until I became very familiar with the role, mandate, and working of the HPO and HPRB, I was a stranger to the whole historical preservation mandate in DC, and I fear that most residents are still in that position. So both the survey and mapping initiative, to identify current and 'eligible' areas of town and particular buildings, and educating the public in that information, would be very helpful to the public in understanding what

		you do, why you do it, and what the value is in it.
A2	Citizens Planning Coalition	The community heritage guides are an important step forward. The section could also suggest that neighborhood libraries develop and present focused collections and interpretational materials on neighborhood history.
A2, A3	Capitol Hill Restoration Society	Telling stories about the city's historic places more often, more vividly, and more compellingly is key to engaging residents and giving them a better understanding of where they live and why it's important. At a recent CHRS board retreat, we too identified this as a goal and have already started increasing our story-telling efforts. HPO and HPRB are uniquely positioned to lead on this front. The designated priority actions for A2 and A3 should be a good start.
A3	Committee of 100 on the Federal City	<p>Goal A3 discusses the role of GIS data in identifying historic resources and making data available to the public, but fails to address other electronic resources that the HPO maintains and existing web resources that can also aid in identifying and providing information to the public on historic resources.</p> <p>The first, and often the only, preservation-related question many DC home owners ask is "when was my house built?" The HPO's historic permit database is a valuable resource to architectural historians and preservationists, but is not easily accessible or easy to use by the general public. The database should be linked to other existing online resources that are more easily accessible by the public. One such online resource is DCPropertyQuest, which does provide limited zoning and historic district information for a single address. Linking the database to DCPropertyQuest would allow home owners to also view when a building permit was granted, who the architect, builder, and original owner was, as well as the original cost of construction. Additionally, existing sites such as DCPropertyQuest could provide links to historic district brochures, National Register data, and other resources already developed or maintained by the HPO that relate to a given property.</p> <p>The HPO should work to obtain funding so that existing historic resource data systems are eventually formatted in a way that can be publically web accessible. Additionally, the HPO should update and include as an online and linked resource its spreadsheet of conservation easements. This will also assist with the verification process in the application for HPRB conceptual review as discussed below in goal C2 "Communicate more clearly."</p>
B	Citizens Planning Coalition	Capacity building for preservation organizations should be an additional element of section B.
B1	Capitol Hill Restoration Society	[W]e encourage adding as a priority the item in B1 about "link[ing] recreational and neighborhood heritage trails through coordinated guides and physical connections."
B1	Kent Boese, ANC SMD 1A08	<p>[Here is an enhancement] that I think the District needs to adopt:</p> <p>Fund more heritage trails and signage/plaques for historic properties. A huge key -- to me -- is making history accessible. Much of our history is still hidden. People like to get to know their neighborhoods. They like tangible history. Every historic landmark should have a plaque with a brief summary of the property. These signs would be 24/7 preservation ambassadors to the community. Cultural Tourism DC has developed a prototype for these and I'd love to have them throughout ANC 1A. I have also fought unsuccessfully for a few years now to have a Park View Heritage Trail. I'm told that there is just no funding available. Yet, Park View is the only Ward 1 neighborhood not represented by one of these trails. Lastly, I've also advocated for much larger history/education boards when possible. The park at 11th & Monroe has one of these and DPR should be developing one for Park View Rec Center (I've been working with DPR on this). You can see what DPR did for the 11th & Monroe park here: http://parkviewdc.com/2012/02/20/trolley-turnaround-park-opens-11th-monroe-ribbon-cutting-to-come/ ... every opportunity should be taken to do this when possible. It incorporates history in an accessible and fun way. It also educated</p>

		children to grow up with an appreciation of history.
B2	Capitol Hill Restoration Society	Speaking out about preservation is crucial, and we agree that strengthening and better using our many voices to advocate for preservation will be vital. We also support revitalizing the Historic Districts Coalition as a collective voice and recommend designating "Write about preservation success stories" as a priority.
B2	Citizens Planning Coalition	Speak out about preservation. Could be the first item of this section.
B2	David Alpert, Greater Greater Washington	<p>[continued from D1]</p> <p>Goal B2, "Speak out about preservation," basically outlines a plan to try to sell more preservation to communities. The objective is:</p> <p>Strengthen mutual support systems needed for an effective community voice for preservation, and use that voice to advocate for preservation in all modes of public dialogue.</p> <p>Supporting actions include "revitalize the Historic Districts Coalition" to encourage new local preservation groups and "establish and develop an advocacy group for DC Modernism," a phase of building that was particularly destructive to our city's livable neighborhoods. Mismatches between preservation and good urbanism often come most of the surface when dealing with modernist buildings.</p> <p>While the plan doesn't call for the preservation office itself to take these steps, it's astounding to see an official document from an office call for people to form advocacy groups to lobby for more influence for that office.</p> <p>The preservation system has a tremendous amount of power over DC's growth, more than in most cities. Preservation staff must be sure they are using that power wisely, not just put out plans which call for increasing their power and convincing residents to like it.</p> <p>Instead of going into sales mode, the preservation movement, both inside and outside the government, needs to better confront the substantive critiques of its decisions.</p>
B3	Capitol Hill Restoration Society	Producing online exhibits of archeological artifacts from DC collections is an excellent priority for educating people about the city's past. So many children and adults are fascinated by what's dug up that this will be a valuable addition to the many ways HPO can newly engage the public.
B3	Dupont Circle Conservancy	Sometimes Archaeology in the District of Columbia appears to be an invisible HPO activity; therefore, we support HPO's Goal B3, "Make Archaeology Visible," and the priority attention it gives to making exhibitions of artifacts available online. Further, we support HPO's intention to investigate the possibility of establishing an Archaeology Curatorial Facility in shared-space with a local or federal institution. That facility should include display space as well.
B3	Kirby Vining	I look forward to archaeology becoming a more commonly used basis for historical considerations as well. Both these are important ways of communicating the history of our town for all purposes.
C1	Capitol Hill Restoration Society	We could not agree more that priorities for designation should emphasize properties that are most likely to be at risk. CHRS's most notable success in this regard was, in cooperation with HPO, expanding the Capitol Hill Historic District to include the area between I-695 and M Street SE. Even so, the Lower 8th Street area is under tremendous pressure as M Street's large-scale development moves farther east, with a 90-foot tall building approved for construction immediately across 7th Street from the landmarked Blue Castle and Lower Barracks Row property owners actively exploring how big and high they can build. With H

		<p>Street NE’s welcome revitalization, development pressure is intense there too, and eligible properties are being lost or disfigured at an alarming rate. We urge HPO to give this goal a high priority, and accordingly making the action item for identifying community priorities for designation a high priority as well. “Acting before it’s too late” [C3] comes into play here too, with Spingarn High School a poster child for designation not occurring until it was too late to influence city agency decisionmaking. Though Spingarn’s historic significance had been noted in the DC schools multiple property nomination, it wasn’t until a streetcar maintenance facility was irrevocably foisted onto the school’s campus that the school’s historic importance was officially recognized. Therefore, we’re glad to see a goal in the 2016 Preservation Plan for HPO and HPRB to proactively work with communities to designate and protect eligible properties and areas threatened by development and inappropriate projects.</p>
		<p>Design Guidelines</p>
C2	Capitol Hill Restoration Society	<p>[Major needs include] <i>more guidelines</i>, including more specifics about various kinds of additions, evaluating and appropriately treating alley and accessory structures, and the importance of historic settings and relationships.</p>
C2	Capitol Hill Restoration Society	<p>We definitely agree with the need for more clear communications and the related priority actions, particularly issuing more detailed guidelines on additions to residential properties. Most of the projects we see are for additions to rowhouses, including pop-ups, and property owners badly need more clarity so they can understand what is and isn’t compatible and why. It would also be helpful for such guidelines to address reasons why piling additional stories onto aging rowhouses can sometimes threaten their structural integrity.</p>
	Citizens Planning Coalition	<p>[continued from Threatened Resources above]</p> <p><i>New construction, the Secretary of Interior Guidelines, and context.</i> A major source of conflict in preservation practice has to do with context sensitive design. The Secretary of Interior Guidelines specify that infill construction be decidedly new. This creates problems because “architecture of our time” typically is at odds with the architectural styles and eras of architectural and historical significance that mark the city’s commercial and residential districts.</p> <p>Preservation theorists such as Stephen Simes of the University of Notre Dame School of Architecture and author of <i>The Future of the Past: A Conservation Ethic for Architecture, Urbanism, and Historic Preservation</i>, argue that “oppositional styling” is deleterious and diminishes those qualities that define historic places and neighborhood context. This Simes-like argument often comes up in testimony by neighborhood stakeholders, because their definition of appropriate context is usually opposite of that called for by the guidelines.</p> <p>[continues at Insensitive Development above]</p>
C2	Committee of 100 on the Federal City	<p>One action stated in Goal C2 is to develop guidelines that address different issues and sensitivities of specific neighborhoods or historic districts. We commend HPO staff on already providing useful design guidelines to assist owners of historic structures to maintain, preserve, and enhance the architectural character of their property. We strongly encourage the development of historic district and neighborhood-specific guidelines and to hopefully have them in place for a neighborhood before an historic district is established.</p>
C2	Historic Anacostia Design Review Committee	<p>As a member of HADRC, the Historic District is also an area that is very important to the community, too many times have residents been fined or at a lost because they do not have guidelines as to what they can and cannot do to their property. It would be a great relief to the residents if the Historic Preservation Office (HPO) would release the guidelines that provide clarity to homeowners, I have spent many days with residents fighting after the fact about violations that could have been</p>

		<p>avoided if the guidelines were available for the residents.</p>
C2	<p>David Alpert, Greater Greater Washington</p>	<p>[continued from Inadequate Communications above]</p> <p>Create clear guidelines to define "compatibility".</p> <p>The other major direction for the preservation office to pursue is making its decisions less apparently subjective. Right now, staff reports seem to pull aesthetic judgments out of thin air, and then the board either agrees or disagrees.</p> <p>Since it's made up of architects, historians, and archaeologists rather than lawyers, most of the comments on the board involve statements like "I like the detailing" or "I think it's too tall."</p> <p>Preservation should not be about what people "like." It's technically about what is "compatible," and an important, yet mostly absent, step is to define, ahead of time and clearly, what "compatible" means.</p> <p>DC has some design guidelines. They are extremely vague and quite out of date. For instance, the document on additions to historic buildings says:</p> <p style="padding-left: 40px;">a contrasting rear addition may be acceptable if it is not visible from a public street or alley and when it does not destroy existing character-defining details, ornamentation and materials of a rear elevation. A new rear addition that can be seen from a public street or alley should be compatible with the design of the rear elevation of the existing building. If the new addition is not visible from the street or alley, a less compatibly designed addition may be acceptable.</p> <p>That's fairly clear, but isn't the preservation office's practice in much of the city. I live in the Dupont Circle historic district and am a member of the Dupont Circle Conservancy. We discuss many rear additions, and at least in Dupont, the Conservancy's policy, and HPO's policy, has been that rear additions of any type are fine as long as they're not visible directly from the street. You wouldn't know that from reading the guidelines.</p> <p>If the rules are different among historic districts, then the guidelines need to say so.</p> <p>The guidelines on new construction in historic districts say:</p> <p style="padding-left: 40px;">Typically, if a new building is more than one story higher or lower than existing buildings that are all the same height, it will be out of character. On the other hand, a new building built in a street of existing buildings of varied heights may be more than one story higher or lower than its immediate neighbors and still be compatible.</p> <p>Sounds like on a street like U Street, a building like that 8-story apartment building should have been a no-brainer. Anyone on the board saying it was too tall was clearly ignoring the written guidelines—except that the guidelines are widely ignored and out of date.</p> <p>The answer is simple. Write newer, much clearer guidelines. That would let property owners figure out for themselves fairly well what is likely to get approved or rejected. What you can build on your property shouldn't depend on the whims of the preservation official, but rather have a firm basis in the code with officials only interpreting the guidelines and applying them to the specifics of a case.</p> <p>Guidelines would also give residents and leaders a chance to actually debate what kinds of restrictions there should be. Each historic restriction also has a consequent impact on the city's ability to house more people, economic growth, the tax base and more.</p> <p>We need a balance, but right now that balancing happens almost entirely behind the scenes, in the minds of HPO staff, who then crank out a report that recommends for or against a project purely on historical grounds. Let people debate whether or</p>

		not a historic guideline is a good idea, not just on the basis of "compatibility" but on its total effect on the city. [continues at Staff Reports above]
		Other Communications Issues
C2	Capitol Hill Restoration Society	[Major needs include] <i>more accessible, easier to use HPO/HPRB website</i> . While there's much valuable information on the current website, it's hard for homeowners to find what they need to know. This in turn helps feed a perception that preservation is arcane and opaque. Frequent inability to access material on OP's server is also very frustrating for those seeking information, including us.
C2	Capitol Hill Restoration Society	[Major needs include] clear and readily available <i>information about what it means to own property in a historic district</i> . This is critical as counterpoint to the misinformation that abounds.
C2	Capitol Hill Restoration Society	[Major needs include] <i>more practical "how-to" guidance</i> for owners of historic/contributing property, including how the preservation review process works for individual projects.
C2	Kirby Vining	Periodic briefings for the Councilmembers might go a long way to helping the Council see what the HPRB priorities are, if that is not done already. I fear that many members of the Council react with surprise at many of the HPRB and Mayor's Agent decisions, which is a problem education can solve.
		Enforcement
C3	ANC 2B	1. Effective Enforcement. The plan should explore how to more effectively enforce historic preservation laws, rules, decisions, and orders. This may require a more formalized enforcement relationship between HPO/HPRB and the Department of Consumer & Regulatory Affairs (DCRA). Frequently, violators pay a limited fine, sometimes as little as \$500, but are not forced thereafter to actually correct the offending construction or work. Rules and decisions are not meaningful unless they can be properly enforced.
C3	ANC 6B	<p>Preservation and Vacant Buildings</p> <p>ANC 6B strongly concurs with HPO's objective to "act before it's too late (Objective C3)." In 2009, ANC 6B experienced an extreme case of demolition by neglect at 820 C St SE, leading to the razing of the property and several years of legal wrangling between the previous owners of the property, new developers and adjacent neighbors. ANC 6B recommends HPO take the following actions in support of this objective:</p> <ol style="list-style-type: none"> 1. Identify contributing historic properties currently on the Department of Consumer and Regulatory Affairs (DCRA) Vacant Building Enforcement (VBE) Unit's Vacant and Blighted Property list, and work with the unit to pressure negligent owners to return properties to productive status, both through punitive measures and the employment of Historic Preservation grants. 2. Coordinate enforcement efforts among DC agencies to achieve compliance. Current efforts are often fractured across multiple agencies, with limited unity of effort in returning properties to productive use. 3. Pursue the most severe cases of demolition by neglect using all available legal authorities, including court action if necessary. 4. Make the system for reporting property deterioration, and tracking progress more transparent for the public. ANC 6B recommends unifying data from DCRA's Property Information Verification system, Office of Tax and Revenue's (OTR) real property tax database and VBE's data repositories to establish a comprehensive picture of deteriorating

		<p>properties. Work with HPO to examine systems like the New Orleans Blight Status, which make tracking the status of blighted properties simple and intuitive.</p> <ol style="list-style-type: none"> 5. Identify deteriorating properties currently in the City's inventory, such as Anne Archbold Hall on Reservation 13, and working with DGS to create and execute stabilization and revitalization plans for these buildings. 6. Make historic preservation of land marked buildings, such as Anne Archbold Hall, a component of economic development, by incorporating restoration into Land Development and Dispensation Agreements, recognizing restoration as part of Planned Unit Development processes and providing incentives to developers, such as provision of infrastructure, in exchange for preservation oriented development. 7. Influence the city's tax sale process to ensure that OTR notifies adjacent neighbors of properties undergoing tax lien sales, particularly when such sales involve properties in historic districts. Adjacent neighbors have more incentive to restore adjacent properties and return them to productive use than remote developers or proxy owners. 8. Work with VBE to establish an annual "Top 25" list of vacant and blighted historic properties and use the list to focus interagency mitigation efforts.
C3	Capitol Hill Restoration Society	[Major needs include] <i>stronger enforcement</i> of preservation violations, including work done without a permit, exceeding the scope of issued permits, demolition by neglect, and vacant and/or abandoned properties.
C3	Capitol Hill Restoration Society	We're very happy to see "Acting before it's too late" as a clearly established goal. As our historic district faces pressures for more infill construction and bigger buildings, both within the district and at its boundaries, action and resolve are desperately needed to withstand pressures brought to bear by developers and individual property owners who want to make everything as big as it can be. For instance, we've seen a single block on the perimeter of the historic district lose more and more of its integrity as its buildings get bigger and bigger, one by one, and we fear this trend could continue. We wholeheartedly support prioritizing stronger enforcement efforts; more effective fine schedules; targeted pursuit of the most severe cases of demolition by neglect; and improved means of discouraging pop-ups, overscaled intrusions, and incompatible development that disfigure the character of historic neighborhoods and corridors. Specific timeframes should be set for adopting fine schedules and other regulations and/or procedures needed to enforce property maintenance and permitting provisions. It was gratifying to see this section illustrated with a Capitol Hill success story, the dramatic transformation of a badly deteriorated corner rowhouse at 8th & C NE into a beautiful, high-end residence, and we encourage HPO to further publicize such examples of success.
C3	Citizens Planning Coalition	Show images of failures. Provide specific discussion about remedies. Problems (e.g., RLUIPA, zoning/matter of right, lack of demolition and alteration protections for undesignated properties, etc.)
C3	Committee of 100 on the Federal City	The draft plan's goal "Act before it's too late" (C3) calls for stronger enforcement and new tools to combat destructive development, neglect, and demolition that threatens the historic fabric of DC's neighborhoods. The Committee of 100 strongly supports the recommendations made by Rebecca Miller of the DC Preservation League (DCPL) at the Office of Planning's Annual Oversight Hearing on March 4 about the limited sanctions available to HPO, the lack of resources to enforce building permits and to avoid "demolition by neglect,"
C3	Dupont Circle Conservancy	The Conservancy thanks HPO for its up-front and behind-the-scenes work with the Dupont Circle neighborhood, DCRA, and the then-owner of a badly deteriorated residence at 16th and T streets, NW, to save it from demolition during the period of the last 4-year preservation plan. While HPO's Goal C3, "Act Before It's Too Late," and its action agenda (P. 53 in the draft plan) is admirable, especially the priority given to adopting fine schedules and other regulations needed to enforce property maintenance provisions of the DC preservation law, we believe that the preservation community cannot wait for an unknown

		time during the coming 4 years for this to happen. There should be a specific time when adoption of a fine schedule will take place and if action to accomplish this requires the intervention of senior Office of Planning officials that should happen;
C3 and D1	Dupont Circle Conservancy	<p>Because of incidents that have occurred recently in public space usage in the Dupont Historic District neighborhood, the Conservancy has concerns about HPO's ability to protect overall Landscaped Yards in Public Space, part of the L'Enfant Plan. (See HP-2.5.4 in the current Comprehensive Plan; HPO's accomplishments during 2009-2012; and its goals for 2016—"Act before it's too late," and "Practice sustainable urbanism," on p. 77 of the current draft plan.) Because of HPO's current workload monitoring execution of authorized permits in general and those in public space in particular, DCC believes that HPO must add to its 2-person team of Historic Preservation Inspectors during the coming 4 years and that addition must occur sooner rather than later during the course of this plan.</p> <p>Further, we recommend that HPO outline the criteria it uses in its review of public space permits for historic districts and publicize them, and that HPO have a trained and knowledgeable officer on the Department of Transportation (DDOT) Public Space Committee who can clearly articulate HPO's criteria and positions. Staff in general should receive additional training related to review and decision-making for approval or disapproval of public space permits, again as they relate to historic districts. Because personal resources are thin, HPO should explore with DDOT management the possibility of the latter's staff being trained in HPO requirements for general and public space permit approval. Accomplishing this would truly be putting strength in the action "Act before It's too late."</p>
C3	Historic Anacostia Design Review Committee	<p>We need additional focus and support for Vacant and Abandoned Properties. I became Commissioner of Historic Anacostia to address vacant and abandoned property. I personally presented a power point slide to DCRA's Director identifying the vacant property in Historic Anacostia. I also identified properties that were not taxed according to the laws of the District of Columbia hoping the property owners would make changes if they were taxed appropriately by the government. My efforts proved to be successful, the properties were reassessed, taxed appropriately and absent homeowners either cleaned up their property or sold it. While my efforts started the process there is a real need for the District to penalize property owners that let their properties sit vacant and literally fall apart. The properties should be rehabbed and put into productive use not just for economic reasons, but also because of very real safety concerns.</p>
D1	ANC 6B	<p>Preservation and Sustainability</p> <p>ANC 6B believes that the plan does not sufficiently address issues of sustainability and the challenges of integrating the changes required both by the Mayor's Sustainable DC Plan or the pressing environmental imperatives of switching to a low carbon economy.</p> <p>"In just one generation - 20 years - the District of Columbia will be the healthiest, greenest, and most livable city in the United States. An international destination for people and investment, the District will be a model of innovative policies and practices that improve quality of life and economic opportunity. We will demonstrate how enhancing our natural and built environments, investing in a diverse clean economy, and reducing disparities among residents can create an educated, equitable and prosperous society."</p> <p>- <i>Mayor Gray's vision for the Sustainable DC Plan</i></p> <p>While HPO is not alone in this challenge, the agency does play a critical role, especially in those neighborhoods where development and preservation live side by side. Particularly as it relates to a vision for integrating cutting edge sustainability concepts in new construction, accommodating distributed generation such as residential solar in historic districts, and generally integrating with the Sustainable DC plan, we believe that the draft plan misses both an opportunity and a significant obligation. Of particular interest to this commission is seeing clearer guidelines for accommodating rooftop solar in a manner that is</p>

		consistent with long term preservation objectives and proactively supports the objectives of city policies that promote the residential solar market.
D1	Capitol Hill Restoration Society	<p>Given the development pressures noted above, we consider it a necessity to make a stronger case for the relationships between preservation, sustainability, and economic growth. Again, HPO and HPRB are uniquely positioned both to encourage investment in historic properties and to promote and adopt financial incentives to help revitalize DC's Main Streets and other commercial corridors, areas, and historic properties with commercial potential. The transformation of the Old Naval Hospital into the beautiful and much-used Hill Center is our community's poster child for what can be made possible with the help of financial incentives. Because making preservation economically attractive is one of the most effective items in the preservation toolkit, we're very happy this Plan has designated it as a major objective.</p>
D1	David Alpert, Greater Greater Washington	<p>[continued from CHAPTER 5 above]</p> <p>For example, one of the specific goals seems tailor-made to address the concerns of urbanist critics, goal D1, "Practice sustainable urbanism." It even has a picture of Capital Bikeshare. Aha! Here, HPO can clearly state that it should try to make preservation decisions that also support sustainable urbanism.</p> <p>It does not take the opportunity. Instead, the goal is:</p> <p>Make a stronger case for the connection between preservation, sustainability, and economic growth, and adopt supportive public incentives.</p> <p>In other words, instead of actually practicing more sustainable urbanism, the office's approach is to try to convince people that it's already practicing it. None of the supporting goals call for any change to the "take off a floor" default stance from many preservation groups. Two of the supporting goals are:</p> <p>Develop sustainability guidelines to educate residents about the resource investment in historic buildings, and ways to adapt them as energy-efficient, renewable resources.</p> <p>Publicize the sustainability benefits of preservation on websites and through award presentations, publications, educational programs, and professional networks.</p> <p>Once again, the approach to sustainable urbanism is to convince people to support what's already going on. It doesn't call for developing guidelines to better align actual preservation decisions with sustainability, but rather guidelines "to educate residents."</p> <p>[continues at B2]</p>
D2	Capitol Hill Restoration Society	<p>We share HPO's view that strengthening public coordination of the preservation review of DC government projects needs improvement, and suggest that the Section 9b draft regs and procedures include broader provisions for community and public involvement. At present they only suggest participating through ANCs, which is not sufficiently inclusive or effective. To that end, we suggest prioritizing the last three action items as well so that efforts to designate additional eligible properties don't take place at the expense of those already designated and at risk – for example, making the historic Crummell School a parking facility for buses without considering its significance, or turning historic Virginia Avenue Park into a staging area for 11th Street Bridge construction, which it took a lawsuit to prevent. Equally important are ensuring that agency managers and planners are familiar with preservation review requirements and procedures, and coordinating closely on preservation planning for public facilities like schools, libraries, fire stations, and recreation centers. The latter require especially sensitive consideration because residents identify closely with these facilities and care deeply about what happens to them, as we've seen with some ongoing projects in the Capitol Hill community. Integrating preservation into agencies' planning processes as early as possible is</p>

		essential, so that preservation issues are taken into account before people become strongly invested in specific locations, designs, or other project elements.
D2	Citizens Planning Coalition	Strengthen government partnerships. An additional element, strengthen the capacity and network of preservation organizations, should be included.
D2	Kent Boese, ANC SMD 1A08	We need to close the loophole that allows Public Charter Schools using District owned property to build additions, or alter them in significant ways, without being subject to the HPO design review process. The current law dates to a time when no one imagined that District owned property would be subject to a long-term lease by a non-government agency that would not be held to the same standards as our DC agencies. All of our municipal buildings are important and need to be equally protected as long as they continue to be owned by the District of Columbia.
D4	Capitol Hill Restoration Society	[T]he objective to enact incentives for reinvesting in historic buildings as affordable housing and small businesses should help meet existing needs while achieving preservation purposes.
D4	Committee of 100 on the Federal City	<p>Goal D4 calls for investing in affordability with one Action to enact a local financial incentive to help repair our older buildings as affordable housing for residents and small businesses. One of the most effective incentives for the rehabilitation of historic buildings is the Federal Rehabilitation Tax Credit. Available for commercial buildings, in 2012, the credit enabled the restoration of more than 1,000 buildings – generating more than \$5.3 billion in private investment and creating over 57,000 jobs. Since it is a credit tied to a construction activity that can only be awarded after successful completion, the program has been proven to generate more income than it costs. In addition to promoting this tax credit opportunity, HPO should also be seeking the establishment of a State Historic Tax Credit. Currently, 31 states have state programs designed to complement the federal program. Recognizing the need for incentives – particularly in distressed neighborhoods, many states also extend their programs to homeowners. Such a program can be structured in a variety of ways – capping a state’s outlay, or available in targeted areas or for certain income bands. Not a grant program, this is an effective way to stimulate homeowner investment in emerging neighborhoods.</p> <p>Recognizing the effectiveness of state historic tax credits, the HPO should be commended for its recent publication of a study entitled “Leveraging Federal Economic Development Resources with State Historic Rehab Tax Credits.” The study looks to quantify the role that state rehabilitation tax credits play in attracting the use of the federal rehabilitation tax program to a state. In addition, the report examines various program design elements across the states to determine their impact on the success of the programs.</p> <p>Receiving national recognition, the report shows the existence of a program in a state tends to boost certified expenditures by up to \$35M a year. Incredibly efficient, a 10% increase in tax credit use can mean \$34M to \$78M more in annual certified expenditures in a given state. With careful planning, states can create or adapt programs to suit their budget realities and meet specific policy goals for preservation, economic development, or targeted investment.</p> <p>In addition to the economic benefits of the tax credit, the HPO should be prepared to better leverage the inherent “green” value of building reuse and rehabilitation. Too often, in the name of energy efficiency, proponents tend to consider existing buildings as hopelessly inefficient. Unfortunately, they tend to completely ignore the energy that was already expended in their construction, the environmental impacts of their potential disposal, and the quality of the materials such as old-growth wood that cannot be replicated today. Not built for “planned depreciation,” recent studies have shown that historic buildings not only withstand the test of time, but the reuse of buildings with an average level of energy performance consistently offers immediate climate change impact reductions compared to more energy-efficient new construction.</p>

		Therefore, as the City strives to meet new energy efficiency goals and continuously touts the number of new “LEED” certified buildings, the HPO should be working to make sure that the city’s message also takes into account the investment in historic resources.
D4	Historic Anacostia Design Review Committee	It would also be helpful to have the Historic Homeowner Grant Program fully funded and restored for the residents of Historic Anacostia. The grant program brought the neighborhood together and provided support for the elders.
		Taking Action Together
	Dupont Circle Conservancy	In an effort to join HPO in pursuing preservation actions as suggested in Chapter 5, “Goals, Objectives and Actions,” under the subheading of “What You Can Do,” the Conservancy will explore with HPO the following: <ul style="list-style-type: none"> • Photographing historic resources in the greater Dupont Circle neighborhood; and • Providing HPO with an updated statement of its neighborhood preservation priorities.
		CHAPTER 6: IMPLEMENTATION
	Capitol Hill Restoration Society	We really like the way the Implementation section has linked a report on HPO’s accomplishments of the last four years to the Comprehensive and Preservation Plans and has specified related 2016 goals for following-up and pursuing in the next four years.
HP-2.2.2	Citizens Planning Coalition	DC does not produce neighborhood plans, which is a significant problem. Small area plans are not comprehensive neighborhood plans as much as they are build out opportunity, analysis, and management plans. Ward Heritage Plans are a step in this direction. The heritage overview plan produced recently by ANC1B is a model of a plan at a scale smaller than that of a Ward. More attention to planning at multiple scales should be provided.
HP-2.4.3	Citizens Planning Coalition	Compatible development. One area where tax credit or other incentives could be appropriate would be for the provision of brick or stone in new construction. Brick is significantly more expensive, compared to glass curtain wall construction.
HP-2.4.4	Louise Dunford Brodnitz, AIA AICP	FOLLOW TIME-TESTED METHODS: Seek guidance from successful preservation plans elsewhere, don’t re-invent the wheel. For example, HP-2.4.4 (2.3) states “Apply design standards in a manner that accounts for different levels of historic significance and different types of historic environments.” This has been done, for example, in London, by establishing rank categories of listed properties.
HP-2.4-A	Committee of 100 on the Federal City	Action HP-2.4-A for the “Conceptual Design Review Process” under the Comprehensive Plan Topic (page 75) calls for enhancing public participation and transparency in the conceptual design review process. One obstacle to transparency and public participation that to date has not been addressed is the self-certification by the applicant on the application for Historic Preservation Conceptual Review. Misrepresentations by applicants concerning existing easements, community consultation (with abutting neighbors, the affected Advisory Neighborhood Commission (ANC), and neighborhood community organizations), and zoning regulations are often overlooked or not discovered until a project is well into the design and approval phases. The result is a lax or easily circumvented requirement for notifications and therefore limited opportunity for public involvement, with the completed projects standing as encouragement to others to do the same. One recent project in Kalorama Triangle went to HPRB review without proper notification given to abutting neighbors and the

		<p>ANC, although the applicant specified on the application form that they had been contacted. Additionally, the concept plan raised multiple zoning questions. The result was that the HPRB spent time reviewing a project that allowed no opportunity for public participation, and due to several unresolved zoning issues, could not be built as submitted for review.</p> <p>We suggest that the application for Historic Preservation Conceptual Review be amended to require names, dates, and contact information for the affected parties that were contacted, as well as some form of preliminary certification from the DC Office of Zoning that the concept plan meets zoning regulations and construction codes. While HPO staff does not have the resources to follow up on every application, the potential risk of an audit will help ensure that those affected by the project have been contacted, as well as allow staff to better keep them notified about the status of projects. Ensuring that projects undergoing HPRB review meet zoning codes and can be built as submitted to the board will save valuable HPRB and staff resources.</p>
HP 2.4-B	Louise Dunford Brodnitz, AIA AICP	<p>GUIDANCE: HP 2.4-B (2.3) of the plan calls for expanding the “development of design standards and guidelines for the treatment and alteration of historic properties...” I strenuously disagree with the expenditure of effort in this area. Staff at HPRB will not be taken seriously in setting for the guidance, but more importantly, it has already been done in the Secretary of the Interior’s Standards for Treatment of Historic Properties (four categories of treatment), and for tax certification and preservation in general, these are the guidelines that matter. To add guidance to the NPS’ body of work should be, at most, an addendum to clarify how these guidelines have been applied in DC but anything more than this just infuriates the design community and is also a duplication of NPS’ well-researched and definitive Standards (also the NPS has Technical Briefs). These should absolutely be referenced as the gold standard by which the HPRB makes their decisions.</p>
HP-2.4-C	Citizens Planning Coalition	<p>It is not clear that “overzoned areas were addressed in conjunction with the ZRR” as was discussed above in terms of the disconnect between height and mass allowed by zoning versus the height and mass of buildings that was typical of pre-1950 neighborhood design and construction.</p>
HP-2.5	Citizens Planning Coalition	<p>HP-2.5: HPO needs to reach out to ASLA for comment on this section.</p>
HP-2.7.2	Citizens Planning Coalition	<p>HP-2.7.2: Receivership and related options are a way to deal with demolition by neglect. The Ohio Statute is a model and should be reviewed. (Ohio Revised Code; Title 37: Health-Safety-Morals; Chapter 3767, Nuisances; Section 3767.41, Buildings constituting public nuisance; action to enforce regulations; and receivership.)</p>