Resolution Concerning Certain Historic Preservation Issues for the Proposed Development at 1800 Columbia Road NW

Advisory Neighborhood Commission 1C ("ANC1C") adopts the following resolution, votes to send it to the Historic Preservation Review Board ("HPRB"), and authorizes any Commissioner of ANC1C to represent ANC1C before HPRB in connection with this matter:

Whereas, PN Hoffman and Potomac Development Group (the "Developers") have submitted revised design plans to HPRB for review of a new mixed-used building at the corner of 18th Street NW and Columbia Road NW, HPRB Case #: 16-388 (hereinafter "The Project");

Whereas, the Project is to be located within the Washington Heights Historic District and must be reviewed in the context of this historic district;

Whereas, the historic district designation recognizes, and HPRB is legally required to preserve, the special architectural and landscape characteristics of the area;

Whereas, District of Colombia Historic Preservation Guidelines call for compatibility of new construction, with particular attention to height, scale, setback, proportion, rhythm, and massing;

Whereas, on May 4, 2016, ANC1C voted 5-0 (with two commissioners abstaining) to urge HPRB to reject the Project because it failed to comply with historic preservation guidelines and the obligations of the Washington Heights Historic District;

Whereas, on June 23, 2016, HPRB held a hearing on the Project ("June HPRB Hearing");

Whereas, at the June HPRB Hearing, the Developer failed to win approval of the Project. Instead, HPRB decided not to vote and Board Members raised numerous substantive concerns about the Project. HPRB noted that the Project failed to comply with the Historic Preservation Guidelines and the requirements of the Washington Heights Historic District. In point of fact, the vast majority of the Board Members' concerns substantively reflect ANC1C's May 2016 resolution;

Whereas, HPRB provided a detailed list of significant revisions that the Developers must implement if they wish to win approval for the Project saying "The Board gave comments and general direction on improving the compatibility of the concept and directed the applicants to return for further review";

Whereas, the revised plan clearly fails to comply with the Washington Heights Historic District;

Whereas, the revised plan clearly fails to comply with the reasoned concerns raised by the HPRB and ANC1C;

Whereas, the Project is proposed to be located on a lot currently occupied by a SunTrust bank branch and a large open-air plaza (the "Plaza");

Whereas, the Plaza has been an open-air market place, farmers' market, and publicly usable plaza since at least 1979;

Whereas, ANC1C has now been presented with historical documents and a legal opinion setting out the case that construction on the plaza portion of the property is not permissible because the plaza is subject to a public easement;

Therefore, it is the view of ANC1C that significant further revisions must be made before the project should be granted approval by HPRB;

Therefore, ANC1C calls on HPRB to:

I. Require that the height and scale be further reduced. The Project, as re-proposed, is still significantly taller than, and fundamentally out of scale with, the adjacent buildings in the Washington Heights Historic District. It fundamentally fails to address the substantive concerns raised by HPRB Board Members at the June HPRB Hearing as discussed below.

Historic Guidelines 4.1 and 4.2 state: "The scale of a new building should usually respect the prevailing scale of its neighbors. In a few cases, a new building's use or symbolic importance may make it appropriate for its scale to differ from that of its neighbors."

Historic Guidelines 8.1 through 8.3 state: "While a new building does not necessarily need to be exactly the same height as its neighbors to be compatible, it should be designed to respect existing building heights. 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."

The Project, as re-proposed, fails to comply with these guidelines and fails to address the concerns raised by HPRB Board Members at the June HPRB Hearing. First, a review of the surrounding buildings adjacent to the Project in the Washington Heights Historic District shows that the neighboring structures are significantly shorter in height and smaller in scale than the proposed building. The Project seeks to fill out the site to the maximum extent permitted under the zoning regulations without regard to the prevailing height and scale of the existing structures. But as a common mixed-use building, it has no special use or symbolic importance that would justify a significant difference in scale from the surrounding buildings.

Second, most of the HPRB Board Members explained that the height and mass/scale of the building were so disproportionate as to be incongruous with existing neighboring structures. In fact, one Board Member declared that the Project ignored the "blood line" of 18th St. and needed to have its height significantly reduced in order to comply with historic preservation law. Similarly, another Board Member explained: "The 18th Street side is truly a problem, and the building is still far too big in comparison to the other buildings along the street." Though the re-proposed Project is a step in the right direction, the new 18th St., NW height

is still incongruous with the adjacent buildings on 18th St. and overwhelms the historic 18th Street NW properties.

Also, the Project violates the Comprehensive Plan for the National Capital (2006). The Comprehensive Plan states:

> *910.11 - Policy UD-2.2.4: Transitions in Building Intensity*: Establish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood. 910.11 (Chapter 9 Urban Design).

There is virtually no transition from the shorter historic 18th St. buildings to the Project and then there is no transition from the 18th St side of the Project to the significantly taller Columbia Road, NW side of the Project. This cannot pass muster.

HPRB should require a further reduction in the height of both the 18th St and Columbia Rd sides of the Project.

II. Require that the setback be increased on the corner. The Project, as re-proposed, fails to satisfy the setback requirements of the Historic Preservation Guidelines.

Historic Guideline 2.1 states: "In addition to complying with the legal setback requirements, a new building should respect the setbacks established by the buildings on a street. For example, the front of a new building should not extend beyond the line created by the fronts of existing buildings, even if allowed to do so by code."

HPRB Board members criticized the Project's proposed public plaza space as "not inviting" and clearly designed to service only a future retail tenant of the Project and not the public. Sadly, the re-designed Project extends five feet further into the Plaza area further reducing the already minimal Plaza area.

While the sides of the proposed building appear to align with the setbacks of the buildings on Columbia Road NW and 18th Street NW, the front of the building that faces the corner fails to respect the long-established setback that creates the Plaza. The re-proposed iteration of the Project even further undermines the long-established building set-back and the Plaza.

Further, ANC1C has now been presented with historical documents and a legal opinion setting out the case that construction on the plaza portion of the property is not permissible because the plaza is subject to a public easement. As this is a matter of considerable significance to the Adams Morgan community, it is the view of ANC1C that permission to build on the plaza portion of the property should not be granted until this issue has been resolved.

III. Require that the proportion, rhythm, and massing be brought into better consistency with the adjacent properties. Assuming that the project is required to be further revised as set forth above, it will be critical to ensure that such further revisions appropriately comply with the following Historic Guidelines:

Historic Guideline 5.1 states: "Proportion is the relationship of the dimensions of building elements, such as windows and doors, to each other and to the elevations. Often, proportions are expressed as mathematical ratios, particularly for buildings based on Greek, Roman, and Renaissance architecture. For example, many historic buildings designed in the nineteenth and early twentieth centuries use mathematical proportions to locate and size windows, doors, columns, cornices and other building elements. The design of a new building should respect, but not necessarily exactly duplicate, the existing proportions of neighboring buildings."

Historic Guideline 6.1 states: "The spacing of repetitive facade elements, such as projecting bays, storefront, windows, doors, belt courses and the like, give an elevation its rhythm. The space between free-standing buildings, the contiguousness of rowhouses and other party-wall buildings, and the heights of roofs, cornices, towers, and other roof projections establishes the rhythm of a street. A new building should respect the rhythm of its neighbors as well as that of the street."

Historic Guideline 7.1 states: "Massing is derived from the articulation of a building's facade through the use of dormers, towers, and other roof projections, as well as façade projections such as bays, porches, and steps. A building's massing significantly contributes to the character of a street, particularly in districts containing rowhouses or contiguous commercial buildings.