



May 15, 2013

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DC Office of Planning
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VIA E-MAIL: david.maloney@dc.gov

RE: Comments on Draft 2016 District of Columbia Historic Preservation Plan

Dear Director Maloney:

On May 14, 2013 at a properly noticed meeting with a quorum present, Advisory Neighborhood Commission (ANC) 6B voted 10-0 to send this letter to the Historic Preservation Office (HPO) with brief comments on *Enriching Our Heritage*, the draft 2016 District of Columbia Historic Preservation Plan.

Overall Plan

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.

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.

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.

Examine Conservation or Preservation Districts

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.

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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.

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.

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.

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 easier for residents to find guidelines and information on HPRB actions would be helpful.

Preservation and Vacant Buildings

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:

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 properties. Work with HPO to examine systems like the New Orleans Blight Status, which make tracking the status of blighted properties simple and intuitive.
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.

Preservation and Sustainability

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.

"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."

Mayor Gray's vision for the Sustainable DC Plan

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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 consistent with long term preservation objectives and proactively supports the objectives of city policies that promote the residential solar market.

ANC 6B and HPO Staff

Again, ANC 6B appreciates this opportunity to comment on the draft preservation plan. 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.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Flahaven".

Brian Flahaven
Chair